

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nurbu Lama;
Namygyal Dhondup aka Chin Yuan Chu;
Zambala Inc

19 CV 02169

Write the full name of each plaintiff.

CV
(Include case number if one has been assigned)

-against-

New Century Foundation;
Yuan Miao; Emilia Wang;
Wu Hong;
Angela Chen;
David Holland
Douglas Pettibone;
Craig J Beauchamp;
Tom Moore;
Winston Kevin McKesson;
Go Daddy;
Facebook

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

COMPLAINT

Do you want a jury trial?
☐ Yes ☐ No

FILED
U.S. DISTRICT COURT
2019 MAR -8 PM 3:49
S.D. OF N.Y.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☒ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?
Section 1 Sherman Anti-trust Act; Section 4, 15, and 16 of the Clayton Antitrust Act

Civil Racketeer Influenced and Corrupt Organizations Act: 18 USC (c)

Federal Corrupt Practice section 78ff(c)(2)

Identity Theft and Assumption Deterrence Act 1998; Perjury 18 USC 1623

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Nurbu Lama, is a citizen of the State of
(Plaintiff's name)

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Yuan Miao & Emilia Wang, is a citizen of the State of
(Defendant's name)

Nevada

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, New Century Foundation, is incorporated under the laws of
the State of California

and has its principal place of business in the State of USA, China and South Asia
or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

<u>Nurbu</u>		<u>Lama</u>
First Name	Middle Initial	Last Name
<u>99 Wall Street, Suite 594</u>		
Street Address		
<u>New York</u>	<u>NY</u>	<u>10005</u>
County, City	State	Zip Code
<u>2127261901</u>	<u>nurbulama999@gmail.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	Yuan	Miao
	First Name	Last Name
	Principle Officer and Founder of New Century Foundation ('NCF')	
	Current Job Title (or other identifying information)	
	8318 Hampshire Bay Street	
	Current Work Address (or other address where defendant may be served)	
	Las Vegas	NV 89139
	County, City	State Zip Code
Defendant 2:	Emilia	Wang
	First Name	Last Name
	NCF Spiritual Teacher and Yuan Miao Personal Assistant	
	Current Job Title (or other identifying information)	
	8318 Hampshire Bay Street	
	Current Work Address (or other address where defendant may be served)	
	Las Vegas	NV 89139
	County, City	State Zip Code
Defendant 3:	Angela	Chen
	First Name	Last Name
	CEO of New Century Foundation	
	Current Job Title (or other identifying information)	
	2021 The Alameda, Suite 330	
	Current Work Address (or other address where defendant may be served)	
	San Jose	CA 95126
	County, City	State Zip Code

Defendant 4: Wu Hong People Republic of China Resident serve to Craig Beauchamp

First Name Last Name

Representative of Wu Hong

Current Job Title (or other identifying information)

PO BOX 25857

Current Work Address (or other address where defendant may be served)

Santa Ana CA 92799

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: Global attack China Taiwan USA

Date(s) of occurrence: 2019; 2015; 2013; 2011

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Please see attached Complaint

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.


I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

March 5 2019

Dated

Nurbu


Plaintiff's Signature

Lama

First Name

Middle Initial

Last Name

99 Wall Street, Suite 594

Street Address

New York

NY

10005

County, City

State

Zip Code

2127261901

nurbulama999@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nurbu Lama;

Namygyal Dhonup

Write the full name of each plaintiff or petitioner.

Case No. _____ CV _____

-against-

New Century Foundation;

Yuan Miao; Emilia Wang

Write the full name of each defendant or respondent.

NOTICE OF MOTION

FEDERAL COMPLAINT

PLEASE TAKE NOTICE that **PLAINTIFF** **NURBU LAMA ET AL**
plaintiff or defendant name of party who is making the motion

requests that the Court:

STOP THIS SHAM ORGANIZATION BY VIRTUE OF AN EQUITABLE INJUNCTIVE ORDER TO PREVENT AND RESTRAIN THEM FROM CAUSING FURTHER VIOLATIONS IN THE LAW. DISSOLVE THE ENTITY.

DISGORGE THEIR PROFITS

AWARD THE DAMAGES FOR THE BREACHES AND UNJUST ENRICHMENT CLAIMED HEREIN.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☒ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☒ the following additional documents: COMPLAINT

MARCH 05 2019

Dated

NURBU LAMA

Name

99 WALL STREET, SUITE 594

Address

212 726 1901

Telephone Number (if available)



Signature

Prison Identification # (if incarcerated)

NEW YORK NY 10005

City

State

Zip Code

nurbulama999@gmail.com

E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nurbu Lama; Namgyal Dhonup
Zambala Inc

Fill in above the full name of each plaintiff or petitioner.

Case No. _____ CV _____

-against-

New Century Foundation; Yuan Miao; Emilia Wang; Angela Chen

David Holland; Douglas Pettibone; Craig Beauchamp; Tom Moore

Winston Kevin McKesson; Do Daddy; Facebook

Fill in above the full name of each defendant or
respondent.

DECLARATION

Provide an Affidavit duly sworn under Oath in support of
Complaint submitted in the US District Court Southern Div.

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Nurbu Lama, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

Please refer to the attached Affidavit duly sworn and submitted as part of this submission.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nurbu Lama;

Namygyal Dhonup

Write the full name of each plaintiff or petitioner.

Case No. _____ CV _____

-against-

New Century Foundation;

Yuan Miao; Emilia Wang

Write the full name of each defendant or respondent.

NOTICE OF MOTION

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PLEASE TAKE NOTICE that PLAINTIFF NURBU LAMA ET AL
plaintiff or defendant name of party who is making the motion

requests that the Court:
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PREVENT AND RESTRAIN THEM FROM CAUSING FURTHER VIOLATIONS IN THE LAW. DISSOLVE
THE ENTITY.

DISGORGE THEIR PROFITS

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the statute under which you are making the motion, if you know.

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- ☒ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☒ the following additional documents: COMPLAINT

MARCH 05 2019

Dated

NURBU LAMA

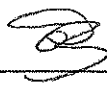
Name

99 WALL STREET, SUITE 594

Address

212 726 1901

Telephone Number (if available)


Signature

Prison Identification # (if incarcerated)

NEW YORK NY 10005

City

State

Zip Code

nurbulama999@gmail.com

E-mail Address (if available)

[illegible]

Page 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nurbu Lama; Namygyal Dhonup

Zambala Inc

Fill in above the full name of each plaintiff or petitioner.

Case No. _____ CV _____

-against-

New Century Foundation; Yuan Miao; Emilia Wang; Angela Chen

David Holland; Douglas Pettibone; Craig Beauchamp; Tom Moore

Winston Kevin McKesson; Do Daddy; Facebook

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respondent.

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Complaint submitted in the US District Court Southern Div.

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I, Nurbu Lama, declare under penalty of perjury that the
following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

Please refer to the attached Affidavit duly sworn and submitted as part of this submission.

Nurbu Lama
99 Wall Street
Suite 594
New York City
New York
10005
E-mail: nurbulama999@gmail.com

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

- 1) NURBU LAMA
- 2) NAMYGAL DHONUP
- 3) ZAMBALA INC,

Plaintiff,

v.

- 1) NEW CENTURY FOUNDATION;
- 2) YUAN MIAO;
- 3) EMILIA WANG;
- 4) WU HONG;
- 5) ANGELA CHEN;
- 6) ;DOUGLAS J. PETTIBONE
- 7) CRAIG J BEAUCHAMP;
- 8) WINSTON KEVIN MCKESSON
- 9) THOMAS E MOORE

Defendants,

Case No.: ____CV_____-

COMPLAINT

Plaintiff Lama Nurbu a resident of New York and Namgyal Dhonup also known as Chin Yuan Chu; founder and owner of Zambala inc, individually and collectively bring this action under Section 1 of the Sherman Antitrust Act Sections [4, 15 and 16] of the Clayton Trust Act and [certain state laws for actual damages, treble damages, punitive damages, declaratory and injunctive relief, costs of suit pre-and post-judgment interest, and other relief, and submit as follows

Nature of the Action and Urgency

This case involves contracts, combinations and conspiracies played out at many levels.

- 1) To exploit the faith and belief of the public and capitalize on same;
- 2) To operate a sham organization utilizing the identity of Tibetan Buddhism and Hinduism;
- 3) To trap and ensnare innocent Lamas and monks straight from the monastery into the organization;
- 4) To exploit their innocence, talent, identity and spiritual lineage to their own economic advantages and propaganda;
- 5) To destroy the sanctity of these traditions;
- 6) To publicly persecute genuine practitioners of these ancient traditions and prevent them from earning a livelihood, this furthers their conspiracy and injures the Plaintiffs and the Public at large in the process.

- 7) To utilize and manipulate the US Government to provide immigrant statuses as per their whims and publicize this to their Chinese students to gain validation and credibility of their organization, this furthers their conspiracy and injures the Plaintiff and the public in the process.
- 8) To utilize and manipulate the US Judiciary to issue orders based on false evidence and then utilize these Court verdicts to give them credibility, to further their conspiracy and injures the Plaintiff and the public in the process.
- 9) To utilize these USA Court verdicts to globally attack the image of Tibetan Buddhism; and Hinduism and dissuade the public from the genuine practitioners and to join their organization instead, which does not have roots in these ancient traditions but in the CCP (China Communist Party).

Jurisdiction and Venue

The Court has subject matter jurisdiction over this action under 28 U.S.C. §§1331, 1332, 1337(a) and 1367(a) and pursuant to Section 4 and 16 of the Clayton Act 15 U.S.C. §§15(a) and 26 and 28 U.S.C. §1391 (b),(c) and (d). URGENT injunctive relief sought and the RICO statute 18 USC §§ 1961, et seq Rolls Royce Motors Inc. v Charles Schmitt &co. 657 Supp. 1040, 1055 (S.D.N.Y) 1987.

Venue is proper in this District pursuant to Section 4, 12 and 16 of the Clayton Act, 15 U.S.C. Section 15(a), 22, 26 and 28 U.S.C. Section 1391 (b) (c) and (d). Given the international nature of this dispute, the accessibility and international exposure of New York for all parties. The Plaintiff's prima facie burden is met by showing that a defendant has contacts with the United States. Minimum contacts with the forum state, as required under the traditional long term jurisdiction analysis, is not necessary. A Defendant's contact with the United States is sufficient to satisfy the requirements of due process. *Dooley v United Technologies Corp.* 786 F Supp. 65 71 (D.D.C. 1992) Accord *Cory* 468 F. 3d at 1230-31; *Boon Partners* 917 F Supp at 397; *Herbstein v Bruetman* 768 F. Supp 79,81 S.D.N.Y 1991). Each Defendant is subject to personal jurisdiction because each transacted business throughout the United States, including in this District.

Defendants' activities and those of their co-conspirators, were within the flow of, were intended to, and did, in fact, have a substantial effect on foreign and interstate commerce. During that period Defendants used the instrumentalities of interstate commerce, the instrumentalities of the judiciary and the instrumentalities of the US Government to further their conspiracy.

The sanctity of our Governmental and Judicial systems rest on the social conscience on its users, especially the members of the Judicial system and the Bar Associations are meant to be Guardian of the integrity of the Judiciary. However the conspiracy has deepened and furthered into this system that has had the effect of rendering Court verdicts that are in fact ultra vires and in clear breach of the fundamental rights of the Plaintiffs and with consequences for the public at large.

This application is urgent. Defendants 1 - 5 are illusive. The Founder has frequently made statements that one day she would disappear and live in a secluded remote place. We are submitting this to the Court at the same time as the DA and AG offices whom have been informed of this matter and requested a letter and details be posted to their bureau of investigations. The US government has the option to join these proceedings with us or to commence separate proceedings as they deem fit. We reserve the right to amend pleadings and to add further parties as the case develops.

There is a real likelihood this organization may cause the death of persons, dissipate their assets and further their conspiracy if the Court and the Government are not put on notice as soon as possible. Given the extent of their infiltration of manipulation and deceit into our society.

The Parties

Lama Nurbu – Lama from the Gelug lineage born in a noble Tibetan origin family and raised and taught in the Sera monastery in India. Under persecution from the NCF organization to return to them. They utilized his Tibetan identity, his chanting, his talent to profit from and give legitimacy to their organization. In the process they destroy his family ties and any chance to earn a livelihood.

Namygyal Dhondup – Life time practitioner Nyigma Kaju lineage - Hosting many Lamas and Authentic Tibetan gurus since childhood. Persecuted by the organization who published false claims about him with the impact of causing a decrease in his business, loss of family ties and USA operations are now on the verge of bankruptcy.

Zambala Inc. - is a Taiwan based industry that operates in the South Asia as well as the USA founded by the Second Plaintiff. Principal place of business in Taiwan with branches in the USA. The company trades in commodities that serve the needs of the spiritual communities and the public at large.

New Century Foundation – a registered non-profit in the USA California that operates throughout the USA, People Republic of China and South Asia that claims to provide enlightenment to people based on the background of their leader Yuan Miao. Its

principal place of business in the Peoples Republic of China and its transacts and conducts business in the United States. This organization has established centers in all of Asia especially in every major city in China, Taiwan, Singapore and Malaysia. Its centers exploded like mushrooms after they utilized the identity of the first Plaintiff.

Yuan Miao The Founder and principal officer of the organization describes herself as from Tibetan decent, an incarnation of the Avalokita Ishwara. She was formerly a CCTV high level officer and her father a high level officer of the China Communist Party.

Emilia Wang also known as Liao Liao named by Yuan Miao meaning the terminator is the personal Assistant of Yuan Miao, a follower of Miao that does everything at her bidding, to the extent of manipulating the judiciary and the public. In her desire to have a comfortable living provided to her by NCF. She has been promoted within the organization to the next in command and has property interests and lives together with Yuan Miao. Both are residents of Nevada at the time of writing this.

Wu Hong – Another lady like Emilia Wang that would do the bidding of Yuan Miao. Her principal address is in the Peoples Republic of China. She has initiated a false case and another pawn in the manipulation of the judiciary to further the crime and conspiracy of the organization.

Angela Chen – is the CEO of NCF, resident in California. She holds herself out as a lawyer offering immigration advice. During the initial conversation she gains all your identity. Feeds this to Miao who then repeats this to the new intake, manipulated into believing Yuan Miao to be a Divine incarnation.

David Holland – Another person like the others seeking the easy life offered by the NCF organization and that has a very close relationship with Yuan Miao. He was used as a pawn to provide false evidence in Court.

Douglas Pettibone – is the lawyer of Emilia Wang and possibly Wu Hong too. Presenting false evidence in Court and obtaining verdicts based on such fabricated and fake evidence is part and parcel for him. His actions further the conspiracy and injure the Plaintiff and the Public at large.

Craig J Beauchamp – Another lawyer of the same category as Douglas Pettibone that will further the conspiracy in Court without acknowledging their foremost duty of being an Officer of the Court.

Tom Moore – The lawyer initially hired for the first Plaintiff to defend a fake case. He came up with a settlement with the other side that he did not communicate to the Plaintiff. In trial he acted like the poodle of Douglas. Either due to a lack of competence or conflict of interest.

Winston Kevin McKesson - The second lawyer hired by the first Plaintiff to appeal the first fake case. As with the first lawyer, contracted with the Plaintiff to defend and safe guard him. In fact buried him. Refused to update him on the appeal until it was lost and out of time. Refused to update him on the second fake case initiated by Wu Hong. A motion to include that case with this proceeding will be made. Given that it is part of the conspiracy and in fact corroborates it.

Go Daddy – they are hosting a domain by the name of lamanorbu.com this was set up to publish the Court Verdicts obtained in the Defendants favor and publish their propaganda. In this respect they are a vehicle to further the conspiracy and their addition to these pleadings is to put them on notice of same.

Facebook - they publicizing the attacks made by anonymous persons on Facebook. They cannot take down any of these false claims without a Court Order. So in the interim they are a conducive vehicle for the activities and the conspiracy of the Defendants.

Other Parties - We reserve to add other Parties involved in this conspiracy as soon as we gain their details and to add them to this Complaint accordingly.

Factual Background

Tibetan Buddhism and Hinduism are ancient traditions with rich heritage backgrounds. There is increasingly groups of Chinese who claim to belong to such lineages in these ancient traditions without any proof thereof and then claim to be purists and publicly condemn the ancient practice of Tibetan Buddhism and Hinduism associating it with sexual abuse and advising the public to stay clear of the Tibetan Lamas and Gurus. They are new to the traditions yet condemn the ancient. It seems to be a common pattern. They seek to monopolize and capitalize on the spiritual market. Where such ancient traditions in the past fostered debate and differences amongst the different strands. These particular groups are out to make money. They play on the faiths and emotions and sell their services. At the same time destroy the genuine practitioner of these ancient traditions. This serves two purposes:

- 1) to destroy the authenticity of the tradition as part of their conspiracy;
- 2) To eliminate competition so that their market share is not diluted.

The First Plaintiff joined the organization in the belief that their leader was a Divine incarnation as she claimed. She exploited his faith and belief. He joined the

organization with the intention to transform the Tibet and China conflict and bring peace and harmony between the communities and peace in the world at large. He had clung to the belief that this was an organization that would benefit society at large. However the events that unfolded within a few years shattered any illusion of that. He realized he was in fact a dangerous game and part of a conspiracy that in fact is out to do damage to Tibetan Buddhism and Hinduism.

He was first hooked into this organization because he needed legal help with his US citizenship immigration. Angela Chen a member of the NCF held herself out as a lawyer. During the initial exchange she obtained as much detail regarding his background. He was then introduced to their leader Yuan Miao who utilizes the information that was provided to her by Angela Chen and then plays on the emotion and faith on the Plaintiff who is devoted to the Divine Mother above all else. She claims to people that the USA granted her citizenship on account of her special skills.

He joins the organization in the belief of her claims, believing that this organization will transform conflict. He is paid USD 300 a month and is asked to contribute USD 185 of this to the rental accommodation. He is not free to choose his own accommodation and has to live with the leader. His passport is retained by them and all of his activities are controlled by them.

Within months of his joining the organization, books are published in his name in Chinese and English. Love Sutra Lama is a book written and published by the Defendants 1-5. His image and monk picture is utilized on the front without his expression permission. Being raised in a monastic tradition he naturally obeys authority and genuinely believed she was such an incarnation as she expressly claimed.

CDs of his chanting are widely published and circulated. He is driven and taken to each of the teachings and workshops by the Defendants. His teaching and workshops itself bring in USD 3000 - 5000 in weeks or months. He was a cash cow for the organization and possessed by same.

The organization mandated that he not be in touch with his family or close friends, and playing on his faith and devotion to the Divine Mother deprived him of his monastic robes. The second Defendant forced him to sleep with her on account of being initiated into the group. Then marketed his devotion to the Divine Mother claiming she granted him enlightenment and empowerment.

There was another layer of secrecy within the organization at the time Fay wang Dai Dai Wang Yen-Fay and Peggy (full names to be provided in due course) were her close

attendants. She would frequently prepare a mixture and provide them to drink. These two persons knew all her secrets. The Plaintiff was eventually taken into the inner circle and then came to realize that this was in fact a sham organization.

The Defendant manipulated the US immigration regarding her status and she used this to her claims of divinity before her students in China. In China she freely opens up centers in all the major cities and openly criticizes the organization she claimed political asylum from in the USA.

Her teachings were not uniform they were polarized depending on which country audience she is in. The purpose of her organization was to make money and it would go at any lengths to do so, even to the extent of defrauding many people and exploiting their wealth in the name of religion and faith.

The Love Sutra Lama book was entirely the propaganda of the Defendants 1-5. It completely utilized and destroyed the identity of the Plaintiff and the wider community at large which they represent. It later transpired that this was part of a conspiracy from Chinese groups who are out to destroy Tibetan Buddhism and Hinduism by utilizing Tibetan Buddhism and Hinduism itself. The Yoga market represents a USD 80 billion dollar market.

The Plaintiff was not allowed to have any relationships outside the circle of the organization nor was he permitted to leave the organization. He was bound in lifelong servitude. He had to run away in the dark of night.

To get him back the Defendants further another conspiracy. They alleged sexual assault and rape cases on him and sent letters demanding payment of USD 50,000 - USD 100,000 to his Adopted Mother. They circulated these alleged claims to all the students he met and everyone he knew.

They initiated claims on him in the Judiciary which were entirely false. They manipulated the entire Court Process and the judiciary. Then they utilized these Court verdicts to cause more damage and anti-competitive behavior. Till date this saga still continues. They will continue this until Plaintiff does not return back to their organization. Their wider conspiracy to destroy Tibetan Buddhism and Hinduism continues.

They have actively published false information on the second Plaintiff and on account of them using and abusing the identity of the first Plaintiff their organizations have expanded. As a result of their manipulation and deceit the Plaintiffs have been harmed.

The Defendants publicize the following statements which corroborate this conspiracy and anti-trust behavior. All these signs prove that Tibetan "Buddhism" is an evil cult and the sexual assaults by the lamas are not merely isolated cases because its doctrines are fundamentally wrong. derived from the Brahman's sexual practice, which is not the Buddha dharma. It is time these practitioners wake up to this realization.

Plaintiff and the public at large have been harmed by the Defendants conspiracy, manipulation and deceit. Please see the attached Affidavits of the Plaintiffs.

Equitable tolling of the statute of limitations due to Defendants' concealment of the conspiracy.

Defendants actively and effectively concealed their collusion as submitted herein, from Plaintiffs. As a result of Defendants fraudulent concealment and illegal activity, all applicable statutes of limitations affecting Plaintiffs' claims have been tolled.

Defendants conspiracy was by its nature secretive and self-concealing. Defendants engaged in a form of manipulation and deceit, which is inherently self concealing and could not be detected by Plaintiffs. The secret nature of Defendants' conspiracy – which relied on deceit, manipulation prevented plaintiffs from uncovering their unlawful conduct.

Moreover Defendants actively conspired to conceal their unlawful conduct. The active steps taken by the Defendants to fraudulently misrepresent the court proceedings and to conceal their conspiracy, and the lack of public information concerning material aspects of the conspiracy, the statute of limitation was tolled for Plaintiffs'

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Plaintiffs hereby incorporate each preceding and succeeding paragraph as though fully set forth herein.

Defendants and their unnamed co-conspirators entered into and engaged in a combination and conspiracy in an unreasonable and unlawful restraint of trade in violation of §1 of the Sherman Act, 15 U.S.C. §1, et seq.

As a direct, material, and proximate result of Defendants' violation of §1 of the Sherman Act, Plaintiffs and members of the Class have suffered injury to their business and property, within the meaning of §4 of the Clayton Act, till present day.

Plaintiffs and members of the Class are entitled to treble damages for Defendants' violations of §1 of the Sherman Act under §4 of the Clayton Act.

Plaintiffs and members of the Class are also entitled to an injunction against Defendants, preventing and restraining the violations alleged above, under §16 of the Clayton Act.

SECOND CLAIMS FOR RELIEF

(Breach of Contract)

Plaintiffs hereby incorporate each preceding and succeeding paragraph as though fully set forth herein.

Plaintiff had joined the organization believing her claims of being an incarnation of the Supreme Being. He offered his services and provided all his original chants and heritage to the organization. He would bring in thousands in revenue for the organization. He contracted to serve an organization that would bring peace and harmony not one that would polarize groups and actually destroy the sanctity of these ancient traditions, the sanctity of the Government and the sanctity of the Judiciary.

The First Plaintiff had a valid contract with Defendants 8-9 to safeguard and protect his interests. As officers of the Court they were duty bound to do so too. However in colluding with the Defendants they in fact deepened the conspiracy and repudiated their contract with the Plaintiff. Please see attached Affidavit.

FOURTH CLAIM FOR RELIEF

Unjust Enrichment

Plaintiffs hereby incorporate each preceding and succeeding paragraph as though fully set forth herein.

Defendants were unjustly enriched at the expense of the Plaintiffs and the facts speak for themselves. Absent their manipulation and deceit Defendants would not have been enriched to such an extent.

Plaintiffs have no adequate remedy at law for these misappropriated gains. The Court should issue a constructive trust compelling Defendants to disgorge to Plaintiffs and all unlawful or inequitable proceeds Defendants received, and all funds Defendants unjustly retained that should have been paid to Plaintiffs

Each Defendant was at all relevant times fully aware of the conspiracy and substantially furthered it as set forth above.

RICO together with the USA Government.

There is a likelihood that the Defendants 1-5 may disappear after the public concert of March 9th at UCLA. Hence this Complaint and submission is filed simultaneously with the Court and the Attorney General Offices and the District Attorney Offices. Both of whom have been apprised of this matter. Hence the urgency of this filing and submission.

Rico Civil remedies set forth in 18 U.S.C. § 1964 (a) (b) and (c) which provides as follows:

a) The district courts of the United States shall have jurisdiction too prevent and restrain violations of section 1962 of this chapter by issuing appropriate orders, including, but not limited to: ordering any person to divest himself of any interest, Direct or indirect; In any enterprise; Imposing reasonable restrictions on the future activities or investments of any person including, but not limited to, prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in especially the activities which affect interstate or foreign commerce. The ordering of the dissolution of such an organization and making provision for the rights of innocent persons.

B) The Attorney General may initiate proceeding under this section. Pending final determination thereof, the court may at any time entry such restraining order or prohibitions, or take such other actions, as it shall deem proper.

C) Any Person injured in his business or property by reason of a violation of section 1962 of this chapter may sue therefore in any appropriate United States district court and shall recover threefold the damages he sustain and the cost of the suit, including a reasonable attorney's fee.

The Defendants have left no stone unturned in the process of completely eliminating and destroying the livelihood of the Plaintiff and preventing him from operating in a capacity independent from them. Please see attached Affidavit. It is proved on the preponderance of the evidence and on the balance of probabilities that the Defendants have orchestrated a criminal organized crime and there is reasonable likelihood that they will commit a violation in the future.

Courts are vested with broad equitable powers to remedy unlawful conduct, including ordering intrusive, structural changes in wrongdoers' entities and practices. The Supreme Court has repeatedly emphasized that courts are vested with extensive

equitable power to fashion appropriate remedies to redress unlawful conduct. *Swann v Charlotte - Mecklenburg Bd of Educ.* 402 U.S. 1 (1971) the Supreme Court stated:

Once a right and a violation have been shown, the scope of a district court's equitable powers to remedy past wrongs is broad for breadth and flexibility are inherent in equitable remedies.

"The essence of equity jurisdiction has been the power of the Chancellor to do equity and to mould each decree to the necessities of the particular case. Flexibility rather than rigidity has distinguished it. The qualities of mercy and practicality have made equity the instrument for nice adjustment and reconciliation between the public interest and private needs as well as between competing private claims." *Hecht Co v Bowles* 321 U.S. 321, 329-330 (1944) Accord *California v American Stores Co*, 495 US 271 284 (1990)

The Supreme Court has pointedly ruled where 'the public interest is involved...those equitable powers assume an even broader and more flexible character than when only a private controversy is at stake. *Porter v Warner Holding Co* 328 US 395 (1946) Accord *Virginian Ry Co v Sys Fed'n* No. 40 300 US 515 552 1937. Courts of equity may and frequently do, go much farther both to give and withhold relief in instances where the

furtherance of the public interest are involved *Golden State Bottling Co v NLRB* 414 US 168, 179-80 (1973)

In accordance with these principles, courts have imposed a wide variety of highly intrusive equitable remedies in institutional reform litigation to reform constitutional violations and to foster paramount public interest, including various structural reforms.

Brown v Bd of Educ. 349 US 204 300-01 (1955) the Supreme Court ruled that courts has very broad equitable powers to order structural changes in school systems to desegregate schools including 'ordering the immediate admission of plaintiff to schools previously attended only by white children.'

In *Milliken v Bradley* 433 US 267, 279-91 (1997), the Supreme Court upheld the equitable powers of a district court as part of a desegregation decree to 'order compensatory or remedial educational programs for schoolchildren who have been subjected to past acts of de jure segregation.

Local 28 of the Sheet Metal Worker's Intl Association v EEOC 478 US 421 (1986) the District Court found that Union Local 28 discriminated against non white workers in recruitment, selection, training and admission to the union. The Supreme Court upheld

the district court's imposition of an affirmative action program requiring Local 28 to adopt various changes its practices and policies, including requiring Local 28 to 'offer annual, non-discriminatory journeyman and apprentice examinations select members according to a white-non-white ratio to be negotiated by the parties, conduct extensive recruitment and and publicity campaigns aimed at minorities, secure the court-appointed administrator's content before issuing temporary work permit and. Mining detailed membership records.

The Supreme Court has likewise recognized courts' expansive equitable authority to order structural changes and other intrusive remedies to redress unconstitutional prison conditions.

Congress found that organized crime had extensively infiltrated and exercised corrupt influence over numerous legitimate businesses and labor unions throughout the United States and hence proposed a new threat to the American Economic system See S REF NO 617 91 st Song 1st Sess. At 76-78 (1969) (S REF. No 91-617

The Senate Report further stated that civil RICO was patterned after the equitable relief available under the antitrust laws and hence 'brings to bear ... the full panoply of civil remedies...now available in the antitrust arena S.REF. No. 91-617 at 81.

Congress stated that the purpose of RICO's remedial provisions was to afford sanctions and new remedies and accordingly mandate that RICO shall be liberally construed to effectuate its remedial purposes. Section 904(a) of PUB L. No 91-452, 84 stat. 922, 923, 947. The Supreme Court has similarly characterized Section 1964 as a 'far-reaching civil enforcement scheme.

The Senate Report regarding RICO also quoted approvingly the Department of Justice's view that 'these equitable remedies would also seem to have a greater potential than that of the penal sanctions for actually removing the criminal figure from a particular organization and enjoining him from engaging in similar activity and that these remedies are flexible, allowing of several alternate course of action for dealing with a particular type of predatory activity and they may also be effectively monitored by the court to insure that its decree are not violated" S. REF No 91-617 at 82-83

Injunctions - AN injunction is the quintessential equitable order designed "to prevent and restrain" violations of law under 18 U.S.C § 1964(a). An injunction is a 'coercive remedy' whereby 'the defendant is enjoined by a prohibitory injunction to refrain from doing specific acts; or he is commanded by a mandatory injunction to carry out specified acts.' DOBBS Vol One at 59,

Divestiture, Dissolution and Reorganization - Section 1964(a) explicitly includes the equitable remedies of divestiture, dissolution and 'reorganization of any enterprise'. "Dissolution refers to a judgement which dissolves or terminates an illegal combination or association - putting it out of business. Divestiture is used to refer to situations where the defendants are required to divest or dispossess themselves of specified property in physical facilities, securities or other assets.

California v American Stores Co 495 US 271, 290 n 16 (1990). Divestiture 'deprives a defendant of the gains from his wrongful conduct' and 'is an equitable remedy designed in the public interest to undo what could have been prevented had the defendants not outdistanced the government in their unlawful project.' Schine Chain Theaters v United States 334 US 110, 128 (1948) Both dissolution and divestiture serve to put an end to the unlawful combination or conspiracy and to deprive defendants of the benefits of their conspiracy.

Disgorgement

Although 'disgorgement' is not explicitly listed in the remedies set forth in 18 U.S.C § 1964, it is well established that 'disgorgement' is a traditional equitable remedy.

Disgorgement requires a wrongdoer to yield the proceeds derived from his unlawful conduct and is an equitable remedy designed to deprive a wrongdoer of his unjust enrichment and to deter other from violating the laws. SEC v First City Financial Corp. 890 F 2d 1215, 1230 (DC Cir 1989).

The Plaintiffs have hereby put the US Government on notice and the Court of their relevant claims under the RICO provisions and stated above the Plaintiffs exercise their exercise their right under section 16 of the Clayton Act to seek equitable relief. Section 16 expressly provides that private person 'shall be entitled to sue for and have injunctive relief.' 15 USC §26. Juxtaposed with Congress's explicit modeling of RICO's private treble damages provisions 'on the civil-action provision of the federal anti-trust law §4 of the Clayton Act.

The 'prevent and restrain' language under the antitrust laws is virtually identical to the 'prevent and restrain' language under RICO's section 1964(a). The Supreme Court and over courts have repeatedly interpreted the 'prevent and restrain' language of the anti trust laws is virtually identical to the 'prevent and restrain' language under RICO's section 1964(ba). As the Supreme Court has observed when Congress has used the same words in RICO's section 1964 as in the corresponding relief provision one the Sherman Act that later was enacted in the Clayton Act 'we can only assume it intended them to

have the same meaning that courts had already given to them Holmes 503 US at 268. Therefore the scope of a district courts equitable authority under the anti trust laws.

The Supreme Court and lower courts have repeatedly interpreted the 'prevent and restrain' language of the anti trust laws to not only authorize injunctions, dissolution and divestiture, but also to broadly encompass order designed to ameliorate ongoing and future ill effects of defendants' past violations.

United States v United States Gypsum Co. 340 U.S 76 (1950) the Supreme Court ruled that: A trial court upon a finding of a conspiracy to restrain of trade and a monopoly has the duty to compel action by the conspirators that will, so far as practicable, cure the ill effects of the illegal conduct and assure the public freedom from its continuance. Such action is not limited to prohibition of the proven means by which the evil was accomplished but may range broadly through practices connected with acts actually found to be illegal. Acts entirely proper when viewed alone may be prohibited. The conspirators should, so far as practicable, be denied future benefits fro their forbidden conduct.

Accordingly in that case the Supreme Court sanctioned a variety of equitable relief that went 'beyond the narrow limits of the proven violation' including ordering the

defendants to undertake actions in the future that will cure the ill effects arising from the defendants' past proven violations.

United States v Glaxo Group Ltd 410 US 52, 64 (1973) 'The purpose of relief in an anti trust case is so far as practicable to cure the ill effects of the illegal conduct and sure the public freedom from its continuance.

Ford Motors Co v United States, 405 U.S. 562, 573 n.8 (1972) 'The suggestion that antitrust violators may not be required to do more than return the market to the status quo ante..' Is not a correct statement of the law...Rather the relief must be directed to that which is 'necessary and appropriate in the public interest to eliminate the effects of the acquisitions offensive to the statute.'

International Boxing club v United States 358 U.S. 242. 262 (1959) holding that antitrust relief to be effective, must go beyond the narrow limits of the proven violations and hence may prohibit certain contracts until the effects of the conspiracy are fully dissipated.

Schine Chain Theaters v United States 334 U.S 110, 128 (1948) (Divestiture and dissolution "deprives the anti-trust defendants of the benefits of their conspiracy"

Consistent with the Supreme Court's decision in this area, The Eighth Circuit has stated: Upon finding an anti-trust defendant guilty of a violation of the Sherman Act, a district Court is 'empowered to fashion appropriate restraints on the defendant's future activities both to avoid a recurrence of the violation and to eliminate its consequences. National Soc. Of Professional Engineers v United States 435 U.S. 679, 697 (1978). In fashioning a remedy a district court should endeavor to ensure that the conspirators "so far as practicable, be denied future benefits from their forbidden conduct" Thus the district court may consider both the continuing effects of past illegal conduct and the possibility of lingering efforts' by the conspirators to capitalize on the benefits of their past illegal conduct.

The foregoing antitrust cases establish that equitable relief to prevent and restrain future violations is not limited to relief prohibiting future conduct, but also broadly encompasses relief designed to cure the ill effects of violators' past and/or ongoing misconduct and to deprive them of the fruits of their misconduct.

The burden of proof in Government civil RICO lawsuits for equitable relief is a preponderance of the evidence. United States v Local 560 of International Bhd. Of Teamsters, 780 F. 2d 267, 279 n12 (3d Cir. 1985);

Therefore to obtain equitable relief is preponderance of the evidence that unless relief is granted there is a reasonable likelihood of a future violation by the defendant.

It can be proved on the preponderance of the evidence let alone on the balance of probabilities that the Defendants conduct is:

1. Part of a pattern and not isolated
2. Were deliberate and not merely technical in nature and
3. The defendant's business will present opportunities to violate the law in the future

Please see the attached Affidavits.

The Supreme Court and other federal courts also have emphasized that mere 'cessation of violation...is no bar to the issuance of an injunction' because past violations are 'highly suggestive of the likelihood of future violations. Hecht Co. Bowles 321 U.S. 327 (1944) SEC v Management Dyn Inc 515 F.2d 801, 807-08 (2d Cir. 1975); SEC v Frist City Financial Corp Ltd., 890 F.2d 1215, 1228-29 (D.C. Cir 1989) Accord SEC v Bilzerian, 29 F.3d 689, 695 (D.C. Cir 1994).

In accordance with these principles, courts have granted the United States injunctive and other equitable relief in many civil RICO cases based on past violations and have rejected arguments that injunctive relief was not necessary because the unlawful activity had supposedly ceased. In these cases courts ordered injunctive relief even though many of the wrongdoers had been convicted of crimes and were not in a position to continue their unlawful conduct because they were imprisoned or removed from office in the corrupt enterprise. Many of these Courts found it particularly significant that these cases involved the corrupt influence of organized crime because of the threat of future violations "may virtually be presumed" from such organized crime involvement. *United States v Locol 1804-1, Intl. Longshoreman's Ass'n* 812 F. Supp 1303, 1316 (S.D.N.Y, 1993)

There is no requirement that before a civil RICO action can be brought, the defendant must have been previously convicted of a RICO violation or a RICO predicate act. *SEDIMA* 479 U.S. AT 488-93.

MAKING DUE PROVISION FOR THE RIGHTS OF INNOCENT PERSONS

Section 1964(a) of RICO provides, in relevant part, that 'district courts of the United States shall have jurisdiction' to impose various equitable remedies 'making due provision for the rights of innocent persons.'

United States v Sasso 215 F.3d 283, 291-92 (2d Cir.2000), the second Circuit ruled that requiring a corrupt former union official to contribute toward the cost of a court authorized monitorship of the union to rid it of corruption was within the district courts' discretion under Section 1964 (a) because inter alia it reduced the cost of monitorship to be borne by innocent union members because such relief would help eliminate corruption within the union.

The Manipulation of people in declaring they are the incarnation of the Supreme Being and requiring people to put faith in her is equivalent to a crime of murder. She completely destroys the person in the process and capitalizes on their wealth. To cover up their crime they go to any lengths to manipulate the Governmental machinery, the Judiciary and the State Bar Associations.

In this respect all the Defendants have liability for a racketeering Act may be based on Aiding and Abetting.

To establish the commission of a pattern of racketeering activity 18 U.S.C. §§ 1961 (5) and 1962(c) require that each defendant commit at two acts of racketeering, 'the last of which occurred within ten year....after the commission of a poor 'rackterring act.

H.J. Inc v Northwestern Bell tel.Com 492 U.S. 229, 237 (1989). The federal circuits have repeatedly held in both criminal (United States v Coon. 187 F.3d 888, 896 (8th Cir.1999); United States v Shifman 124 F 3d 31, 36-37 (1st Cir 1997); United States v Darden, 70 F. 3d 1507, 1526 (8th Cir.1995) and civil (Aetna Was. Sur. Co. v P&B Autobody, 43 F.3d 1546, 1560 (1st Cir. 1994); Cox v Admin U.S. Steel & Carnegie 17 F 3d 1386, 1410 (11th Cir. 1994); McLaughlin v Anderson 962 F. 2d 187, 192-93 (2d Cir. 1992)

Rico cases that a defendant's liability for personally committing a predicate racketeering act may be established by proof that the defendants aided and abetted the commission of the racketeering act.

PRINCIPLES OF RESPONDENT SUPERIOR

This principle is applicable to the Defendants. It is well established that a collective entity, such as a corporation or labor union may act only through its agents and hence may be held liable for the acts of its officers, employees and other agents. This is true in both criminal prosecutions *United States v Sun-Diamond Growers of California* 138 F. 3d 961, 970 (D.C. Cir 1998) *aff'd* 526 U.S. 398 (1999) as well as in civil cases. See *United States v Brothers Constr Co. of Ohio* 219 F.3d. 300, 310-311 (4th Cir 2000) *Davis v Mutual Life Ins Co of New York* 6 F.d 367, 378-80 (6th Cir 1993) (respondent superior liability in RICO cases permissible since corporate principals may act only through their agents). Accord *United States v Philip Morris USA Inc.* 449 F. Supp. 2d at 892-93.

OKI Semiconductor Co v Wells Fargo Bank. 298 F.3d 768, 775-76 (9th Cir.2002) ("This possibility of respondent superior liability for an employee's RICO violations encourages employers to monitor closely the activities of their employees to ensure that these employees are not engaged in racketeering. It also serves to compensate the victims of racketeering activity. Vicarious liability based on the doctrine of respondent superior thereby fosters RICO's deterrent and compensatory goals.

Therefore a collective entity may be held liable for the statement or wrongful acts of its agents or employees when they are acting within the scope of their authority or the course of their employment. See *Burlington Indus., Inc. v. Ellerth* 524 U.S. 742, 756 (1998); Restatement (second) of Agency §219 et seq. (1958) so long as the action is motivated at least in part to benefit the principal. See *Sun- Diamond Growers*, 138 F.3d at 970; *Local 1814, Intl's Longshoremen's Ass'n v. NLRB* 735 F.2d 1384, 1395 (D.C. Cir. 1984) Restatement (Second) of Agency §228 (1958).

Moreover in civil actions 'there may be no need to show that the agent acted to further the principal's interests - a showing of 'apparent authority is often enough *Sun Diamond Growers* 128 F.3d at 970 n.9 (D.C. Cir 1998) citing *American Soc'y of Mech Eng'rs v. Hydrolevel Corp* 456 U.S. 556, 573-74 (1982). And even where the agent's action is beyond the original express, implied or apparent authority, an act may be attributed to the principal if it is later ratified either explicitly or by implication. See *Cox v. Administrator U.S. Steel & Carnegie* 17 F.3d 1386, 1409 (11th Cir. 1994).

Indeed if the act is done within the course of employment and with intent to benefit the collective entity, the collective entity is liable even if the act was unlawful. (*United States v. American Radiator and Standard Sanitary Corp.* 443 F.2d at 204-05; *United States v. Automated Medical Labs*, 770 F.2d 399, 407 (4th Cir.1985); *Egan v. United States* 137 F.2d

369, 379 (8th Cir. 1943). Or the act was done contrary to instructions or policies (Automated Medical Labs 770 F.2d at 407; United States v Beush 596 F. 2d 871 877 (9th Circuit).

It is well established that 'the knowledge of the employees if the knowledge of the corporation.' Apex Oil Co v United States 530 F.2d 1291, 1295 (8th Cir.s 1976) See e.g. United States v Investment Enters Inc. 3 B.R. 495, 499 n.2 (Bankr. E.D. Va 1980 ('The knowledge of the employees is the knowledge of the corporation. ' Apex Oil co v United States 530 F.2d 1291, 1295 (8th Cir. 1976). See e.g. United States v Investment Enters Inc. 10 F.3d 263, 266 (5th Cir 1993) (corporation liable for offenses arising from interstate transportation of obscenity based on president's actions.

Duples Envelope Co v Denominational Envelope Co. 80 F. 2d 179, 182 (4th Cir 1935) (Corporation affected with constructive knowledge of all material facts of which an officer acquired knowledge while acting in the course of his employment and within scope of his authority United States v Josleyn 206 F.3d 144, 159 (1st Cir 2000) citing cases for agent's knowledge being imputed to the company. United States v Josleyn 206 F.3d 144, 159 (there is no requirement that a person be a central figure at a corporation in order for that person's knowledge to be imputed to the corporation.

A principal is attributed with the knowledge acquired by its agent even if the information is never communicated to it - New York University v First Fin. Ins Co. 322 F. 3d 750, 753-54 & n.2 (2d Cir. 2003) or even after termination of the services of that office, employee or agent.

See Acme Precision Prods. Inc v Am alloys Corp 422 F.2d 1395, 1398 (8th Cir 1970) (knowledge by a corporation, obtained by and through its arrivers and key employees of facts of continuing importance to business of the corporation, even after termination of services of that officer or employee is conclusive upon the corporation.

In affirming corporate criminal liability, the Supreme Court has noted that:

We see no valid objection in law, and every reason in public policy, why the corporation, which profits by the transaction can only act through its agents and officers, shall be held punishable by fine because of the knowledge and intent of its agents to whom it has entrusted authority to act in the subject-matter of making and fixing rates of transportation and whose knowledge and purposes may well be attributed to the corporation for which the agents act.

PRAYER FOR RELIEF

Plaintiff demand relief as follows:

- A. The Court exercises its equitable discretionary powers and the unlawful conduct alleged herein by adjudges and decreed to violate Section 1 of the Sherman Anti-trust Act, 15 U.S.C;
- B. That Defendants be permanently enjoined and restrained from continuing and maintaining the conspiracy as submitted in the Complaint under Section 16 of the Clayton Anti-trust Act, 15 U.S.C Section 26 and to refrain from trading under the name of Tibetan Buddhism and Hinduism such as Himalayan Master etc.;
- C. That the Court award Plaintiff damages against Defendants for their violations of federal antitrust laws, in an amount to be trebled under section 4 of the Clayton Antitrust Act 15 U.S.C section §15, plus interest;
- D. That the Court award Plaintiff damages against the Defendants specified for their breaches of contract, as well as their breached of their implied duty of good faith and fair dealing;
- E. That the Court order Defendants to disgorge to Plaintiff any amounts by which Defendants were unjustly enriched directly at the expense of Plaintiffs;

F. That the Court award Plaintiff damages for the loss of their livelihood, their costs for this action as provided for;

G. That the Court direct such further relief it may deem just and proper.

Dated March 05 2019

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New York
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NURBU LAMA
NAMYGYAL DHONUP
ZAMBALA INC,

Plaintiff,

v.

NEW CENTURY FOUNDATION; YUAN
MIAO; EMILIA WANG; WU HONG;
ANGELA CHEN; THOMAS E. MOORE;
CRAIG JAGO BEAUCHAMP; DAUGLAS J.
PETTIBONE; WINSTON KEVIN
MCKESSON;

Defendants,

Case No.: ____CV_____-

AFFIDAVIT OF LAMA NURBU

I Lama Nurbu pay Homage to the Divine Mother

The Supreme being

The Universal spirit who is the ultimate guiding principle of this Universe.

The cause of creation

The bestower of salvation

Duly Depone under Oath

I am a Tibetan Lama of the Gelug lineage from the Sera Monastery of South India Mysore India since 1987. I grew up amongst my fellow celibate monks and Gurus (Lamas) in the monastery centered on discipline dedication and devotion to the Supreme Divine Mother. I grew up on the teachings of Tibetan Buddhism and taught in such a protected, trusting and sacred environment, under the shelter of my Guru (revered Lamas). In the sacred scriptures it mentions the incarnation of the Divine Mother and I wanted to dedicate my life to such an incarnation, which is rare, we are devoted to such beings and offer ourselves in selfless service to Her. I had not met such an incarnation, so other than my Gurus words in obeying Her above everything, I prayed to meet such an incarnation.

The monastery was a pure environment, I did not know what lies, sex and deceit meant, I grew up in an environment of love, compassion, truth and trust. We spent all of our time in prayer, meditation and study of the scriptures. After fourteen years of intense study and teaching in the monastery up to the level of Geshe which is the equivalent of PHD. I left India and went to Taiwan to expand the monastery and more importantly the teachings of Dharma. All my Gurus including the Dalai Lama always said that we should share the Dharmic teachings with the Chinese. I dreamed of a world of Peace and

harmony. I wanted to bring harmony between the Tibetan and Chinese Community and share the sacred teachings to the world at large.

I came to the USA and was visit invited to the Bodhi Heart organization and share the Tibetan Buddhism teachings I had studied and taught in the monastery. The interest and number of students grew considerably, and I became a permanent resident in the US. I took part in a number of inter faith conferences and found the USA to be a place of compassion, love and truth. Please see the picture exhibits attached.

During that time I was looking for an immigration lawyer that could help me with my citizenship application, I was referred to a lady by the name of Angela Chen, she claimed to be a professor of Law, she was running a private family business in that office which had a State Farmers Insurance, her husband's office and at the same time New Century Foundation's head office. I went to address legal questions with her, and she started to discuss spirituality and we shared our spiritual background, I told her I was from the Gelug lineage from Sera Monastery. She offered me a book which she said is Yuan Miao, a Tibetan Shakti an incarnation of the Divine Mother, Tibetan Dakini lineage holder.

In the book Yuan Miao declares herself as having a very successful material life as a former CCTV director fully devoted to a life of Dharma and that her Grandmother's

was a Dakini in Tibet. Dakini is a fully awakened woman. Her father's side is a High Official of the Chinese Communist Party ('CCP') and that her Grandfather is a Zen Master. In the book she explains all type of spiritual miracles that happened to her. She states in 1999 the Tibetan Deity Avalokita Ishwara appeared in her and told her that she had to go to the USA. She also speaks of the Falun Gong organization attacking the Zhongnanhai - Chinese central Government compound in that year.

Naive from the monastery I accepted what she said. I was brought up in a trusting, non-political environment, I did not believe someone can use Dharma, Faith and Religion to cheat people. I trusted what I read and wanted to meet her. I thought together we can spread the Dharma teachings into China especially with her claims of being an incarnation and my dream of devoting my life to such an incarnation.

I first met her in San Jose at Angela Chan's office, and She told me that we were destined to meet and that her and her students were praying for Manjushree the Buddha of wisdom to come and guide their organization and that I had finally come. The Gelug tradition my lineage is famous for being holders of the Manjushree deity. She was excited when she saw me and stated that her prayers have finally been answered. My heart was touched that an incarnation of the Divine Mother was waiting for me to come and that it was destiny that I should be there. The incarnations that I

had been reading in the scriptures were true and that I would have an opportunity to devote my life to such an incarnation and spread the sacred teachings in China. She told all her students that I was the first Lama to join the organization.

I was invited to join them for dinner at Angela Chan's house and she invited herself into my car on the drive from the office to the house. In the car she was acting very innocently looking amazed that I can drive stating that she was very innocent of the modern worldly ways. I trusted everything she said, and she played on my love and devotion to the Divine Mother and my lineage that I had shared with Angela Chan on the first meeting.

At Angela's house I was invited to spend the night there. In the dark of night, she came to my room and invited her into my bed, I was petrified and fell down, then she laughed and stated that she was sent to me by my Guru and I have to sleep with her as part of an initiation. I was shocked, petrified, I never knew what sex was. I only knew that her word was Law and I had to obey it. I grew up on the scriptures which mandates us to take the words of the Divine Mother incarnation as sacred. We don't question it, out of faith and devotion we just comply and obey. Yuan Miao is 12 years older, I was never physically attracted to her nor desirous of sleeping with anyone. I just wanted to devote my life to an incarnation of the Divine Mother and spread the sacred teachings

in China and create peace between the Chinese and Tibetan communities. She told me that I had to sleep with her so I can assimilate with the Chinese community. I was an ordained monk that knew nothing about sex. All I knew that if the Supreme Being incarnate asks for my life I would give it.

I had no desire or need to sleep with Yuan Miao but did so on account of her asking me to do so. The following day I left and went to Bodhi Heart organization, I told my students that I had renounced my monastic robes and would devote my life to the service of the Supreme being incarnated. I considered it my good fortune to serve such an incarnation, it was my lifelong dream. After leaving the Bodhi Heart Organization I came back to Angela Chan's house and waited for Yuan Miao and Dai Dai Fay Wang, her assistant. They came after two months. From then onwards I started teaching under the NCF banner. All the chants were my own which had been passed on in my lineage. Yuan Miao was very eager to learn them and publish them under the NCF banner.

Within months CDs and books of my chants and hers were published. The Transcendence Light CD contains most of my songs and chants. I further provided the ShivaGaruda workshops. My workshops and chanting were entirely oral. I was paid a monthly wage of USD 300 and out of that I had to contribute USD 185 back to the organization for my accommodation dues. Till date I have never received any

contribution from the sale they made on the CDS, the selling of my music and chants. However, my love and devotion to the Divine Mother made me not question this financial arrangement.

As a Tibetan descent that grew up in India my knowledge of Chinese and English is not to a standard that I can write books. Within months Yuan Miao wanted to work on the Love Sutra Lama book. She asked me questions of my background she was intrigued to learn that my father's family was from Logo Lake in Tibet and said she was writing a book. The book was published in haste (within four months) and distributed, they put one of my old monk pictures on the cover. She said during this span of time she had to make as much money as possible for the organization. I was paid a stipend of USD 200 a month yet my workshops teachings would generate USD 3000 - USD 5000 a month for them. I thought all these funds were provided to further the causes of the non-profit and the raising of consciousness in society.

Within months CDS, book and marketing material was published, and I had a full schedule of teaching in the US and in China. Some of the concerts I would do with Yuan Miao, my travels were always with her or her assistants. Given that I had first approached Angela Chen for immigration advice they had all my bio details from the outset and even retained my passport. They changed my attire and started to refer to

me as the Love Sutra Lama, Tantra Master, Varjrayana Master. I never used these names. I later realized it was a publicity stunt.

The NCF group was a very Controlling Group Yuan Miao controlled the format of all the teachings and how I was dropped off and collected to each teaching. I was not allowed to drive or own a car or drive anywhere myself. I was not permitted to live in a residence other than the ones she chose. I was not allowed to contact my family community members or friends. She told me that I had to disconnect from them. They kept my passport in their custody. I grew up in a monastic tradition that obeyed the leader so naturally obeyed in the name of Dharma, in the name of my devotion to the Supreme Being incarnate.

My Tibetan friend Namgyal Dhonup from Taiwan came to visit me and told me he did not believe her claims. He attended a few of the public programs and my teachings. My US adopted Mother came to visit me and Yuan Miao acted very strange, she sat in between me and my mother and was very possessive over me. She asked me not to be in touch with my US adopted Mother. She further prevented me from meeting my mother who was in Tibet at the time. My mother in Tibet passed away yearning to see me.

I continued with my oral teachings, we moved from Angela Chens house to Saturn and Jupiters House. Yuan Miao was excessively possessive over me. She frequently forced me to sleep with her. However, in front of the other male members Srikesh (full name to be provided later) and David Holland she acted very distant, she told me she sleeps with them too and she did not want their hearts to be hurt.

I did not understand her need to sleep with men like this. Like I said above devotion does not Judge.

I am a man dedicated to Truth. This dedication to truth helped me discover the following:

At around March/April 2010 she had an immigration interview and asked that I come with her. She begged that I pray for her last life obstacle and that was her US citizenship. It was the first time I saw her very fearful. I asked her but you tell the students in China you obtained your US green card by virtue of your special skills, so why is there a problem? She said she applied via political asylum of the Falun Gong spiritual group. She asked me not to reveal this secret to anyone and that only I, Dai Dai Fay Wang and Peggy knew of this secret.

I never saw a political asylum person freely spread a spiritual organization in China using Tibetan Buddhism and Hinduism without any difficulty. I began to realize that if she can manipulate the Governments in her affiliation with a spiritual organization such as the Falun Gong then it might be that she has manipulated all these people in her claims on coming from a Tibetan lineage and her assertions of being an incarnation of the Supreme Being. An incarnation of Quan Yin.

I noticed that she would state to the students in China, the US Government has recognized her special skills and gave her permanent residency and that soon China will take over the world. In front of the US students she states that she applied via political asylum of the Falun Gong. This brought me back to the book she wrote that the Falun Gong had attacked the Chinese Government in 1999. However, in 1999 the Falun Gong stated that they had never attacked the Chinese Government, it was a peaceful gathering of 10,000. However, to exert control over them the Chinese Government stated that they attacked the Chinese central Government.

I then realized she was formerly a CCTV high level employee, her father is a CCP (China Communist Party official. I started to observe her behavior and noticed that it was just manipulations and deceit. She can easily manipulate the US Government that she is a

political asylum applicant but in China criticize that same group that she used to obtain political asylum from. I noticed that she in fact knew nothing about Tibetan as she would whisper something in my ear that is Chinese and then state to the students, she was talking in Tibetan with me. It dawned upon me that I was under the illusion that I had come to foster the harmony between the Tibetans and Chinese in spiritual harmony. It seemed that I was just a pawn in a dangerous game. My Authentic, Tibetan Lama identity was being used for this organization's propaganda. The book Love Sutra Lama is all her words, manipulation and deceit. It is a counterfeit book on spirituality, and she stole my identity for it. It gave her sham organization legitimation and she generated huge profits and growth in business. The website and teaching materials, books and publications were thus divided into two groups. One for the USA markets and one for the China market. She knew how to manipulate each group into her false claims.

I noticed that funds donated and from the teachings were used for gambling in Vegas; for expensive plastic surgery to remove the fat in her waist and other facial cosmetic plastic surgery. I had to look after her and tender to her care and needs after each of these surgeries. Very Expensive accommodation, wining and dining. I realized that the teachings I had shared with her from my monastery and Gelug lineage in fact brought legitimacy to her organization. They used me and my monk heritage image and

identity. I was just a pawn in a big conspiracy of theirs to discredit the ancient traditions of Tibetan Buddhism and Hinduism.

I began to distant myself from her, I did not know how to get out of the organization, it was so controlled. She must have noticed this distancing as her following actions was an attempt to gain leverage over me to bind me in the organization further, I was their cash cow. In the Sera Mon house one evening in front of David Holland and Dai Dai fay Wang, she pulled out a knife placed it in my hand and asked me if I loved her then show display my loyalty by drawing blood from my hand and offering it to her. As soon as the knife was in my hand, David Holland called the police, and they stated that I had tried to injure her. The police then said this seems to be a family issue and left.

I was later sent to the teachings in China during that time I met a lady by name of Jian Ciao and started to develop a relationship. I wanted to get out of NCF and show Miao that I wanted to leave. Yuan Miao came to find out about this relationship and became ballistic and wild. She ordered that I pay USD 100,000 forthwith. Out of the USD 300 I was paid, I had to give USD 185 towards monthly rent. Where would I get USD 100,000 from. She clearly wanted to enslave me into the organization with such demands. Controlled within the organization there was no way I could have that money to pay. In

return she wanted my life time services to her. All the donations that students had given me personally in teachings had to be given to her and the NCF organization.

One evening in October 2011 at night whilst every one was asleep I left the house and the organization. I called my US adopted mother and she requested that I go to the Mendocino house in Manchester. She told me NCF is a cult. I never knew what a cult was. I went to the house and did a long mediation retreat.

In November 2011 NCF wrote to my US adopted mother asking money from her for alleged sexual assaults I had done. NCF was doing this to cut all the financial support I had with anyone so I would have no option but to return to them. NCF in November 2011 started circulating e-mails and news that I had been guilty of sexual assault.

I spent most of the time to myself and gradually started teaching, these instantly became a success and people started to become interested in my teachings, news spread that I was teaching again. In July 2013 I received a phone call from Emilia Wang, she called stating that a prisoner I had met in the Long Beach Terminal Island prison had just been released and was eager to meet me and needed my help. I wanted to help and told her that I am currently in Northern CA not Southern CA. She said it was

fine they would drive up, and I provided the address and we arranged to meet close to the house.

I did not meet Emilia Wang or the released prisoner, I was met with a man who asked if I was Lama Nurbu and left a huge bundle of paper in my hands. I saw it was a Complaint from Emilia Wang alleging sexual assault. I was shocked. Nothing as claimed in the Court complaint and documents occurred. It was all false.

I was referred to a lawyer named Tom Moore. He told me not to worry he will have a talk with NCF. I did not hear anything until March 21 2014 in an e-mail stating that the lawyer of Emilia Wang had scheduled a deposition of Wu Hong on a rape case. I had never heard of Wu Hong. I drove all the way from Northern CA to Southern CA to attend the deposition. However, once I reached LA, my lawyer Tom Moore did not let me enter nor was I able to meet him.

I was later contacted around April 2015, I was informed of some settlement discussions that had taken place and that Douglas Pettibone stated that this case was not about money it was about something else. This is the only information that I was given. I thought it would be resolved as soon as possible. However, at one point Mr Moore asked that I admit that I watched a phone with prostitutes on it. I told him I never did

as they allege why should I admit this. For my deposition I was not allowed to review the papers, or have a translator in the room. I was asked to sign the papers and drop him to the airport straightaway.

All the evidence that was submitted in Court was the propaganda of NCF, like the question and answers sheet she provided making false claims and allegations on me and stating that I was part of the Tibetan separatist groups, she made false claims that I had committed sexual assault and rape of many women. Lamas are sexual predators. In fact all the projections on me were in fact her own. She had a group of women always with her and would do anything at her bidding. They were paid for it with expensive accommodation, wining and dining and believed in her claims of being a Divine incarnation.

Trial was scheduled without a jury and without a court reporter, I did not know such things were required and my lawyer did not think it was necessary. At trial Tom Moore very distant from me. Emilia Wang was in the Court room. Yuan Miao and Angela Chen was also present at Court but outside. During the four day trial my lawyer was very distant with me, he kept asking me not to talk to him and to keep a distance. I did not have a clue what was happening. Neither was a translator present.

In court my lawyer did not offer into evidence what I had given to prove my innocence. I have no experience in this and my lawyer refused to help or object to the false allegations put on me in Court. They stated that I had committed sexual assault, Emilia Wang testified to this effect. In Court.

They stated that they did not know that I had a fake passport and that I was hiding my true identity from them. David Holland had found my passport in my room and that I was born in Nepal when the book Love Sutra Lama states I was born in Tibet. The evidence that they kept my passport in their custody and that I did not write the book was not presented in Court. They painted my image as a counterfeit teacher that lied about my identity and sexually abused people.

In Court Emilia Wang stated that she was not close to Yuan Miao but the evidence I submitted that they purchased a house together at the start of this claim, was dismissed.

I spent my entire life a monk in a monastery dedicated to a life of devotion, trust and love. In Court this CCTV lady is using the US Court system to establish my identity. When in fact they had been capitalizing on my identity and Tibetan Buddhism. The Court verdict finding against me was later published online. A domain by the name of

lamanorbu.com was created publishing this false information and has been given the USA Court stamp of approval. Please see attached Exhibit.

I next became a victim of several online attacks and NCF went out to destroy my image globally especially in China. I requested Go Daddy to remove this, but they stated they could not and that the owner of the domain had paid to be anonymous. However, the website is all the propaganda of NCF. It publishes their false claims and even their lawyer Douglas Pettibone's website was linked publishing how he had achieved justice for sexual assault victims and he portrayed me as a criminal on his website. These websites were linked with other Anti Buddhism and Anti-Hinduism organizations.

Love Sutra Lama is all about a book that states monks cannot achieve enlightenment without coming to her feet and that I had my first experience of kundalini awakening with her. She was writing testimonies about herself using my identity. All of this was fake and was the main reason I left the organization. Such an incarnation never declares her to be one, It must be felt and acknowledged by others. In this cases she was writing her own propaganda and publishing it in the name of Tibetan Buddhism and Hinduism.. This is what my friend Namygyal Dhonup warned me about. These ladies such as Emilia Wang just want a comfortable life and NCF provides this to them. They would do anything at their bidding.

This Court Verdict gave them more ammunition to attack me. I recalled at the end of trial my lawyer Tom Moore told me that Yuan Miao would be mad at him for stating that NCF was a cult. He later told me that I need not worry I was now free of NCF. I was not. The attacks never stopped. The links to these attacks were linked with other organizations such as the www.enlighten.org.tw which publish on their website that the fundamental doctrine of Tibetan Buddhism requires followers to practice having sex with as many partners as possible, including unlawful sexual relationships. This website is Chinese owned and discredits Tibetan Buddhism and Hinduism.

All the teachings that I had scheduled in the USA were cancelled as someone would report that I was a counterfeit teacher based on this USA Court verdict. In July 2015 I was invited to Spain for teachings. On the way back at the airport immigration I was taken into further questioning at the airport. Someone had complained that I had a fake passport. The immigration officials eventually let me proceed after seeing that my passport was genuine.

NCF found out that I had an interview for my US citizenship in 2014 and went to report that I had these cases on me. This stalled my citizenship application since 2014. My case was not even moved to Washington DC in 2014 and nor to New York in 2017 when I

became a New York resident. The immigration office held it in the San Francisco California till date.

In October 27 2015 I received an e-mail from Tom Moore providing a tentative ruling, he told me he was disappointed with the result but that I am now free of NCF. I called him and told him I wanted to appeal, my silence will make me guilty. He said I cannot do an appeal as there was no Court Reporter. I was adamant to keep fighting and I decided to appeal this decision. Tom Moore discouraged me so I went to a someone who advertised himself as a super lawyer Winston Kevin McKesson. I provided him all the evidence. I made every effort to meet him when he requested, I am not resident in Southern CA. I truly hoped he was the one that could solve this matter.

In December 2015 I married Angel An Jing, she was very supportive of my fight. She was from China. We got married in Northern California. In January 2015 I was doing a workshop in Berkeley and during that workshop I was served with a case of an alleged rape case that of Wu Hong. It claimed that during a teaching at NCF I seduced and raped her. I did not even now who this lady was. I recalled in April 2014 Tom Moore had attended a deposition of Wu Hong in LA. I was not allowed to attend. They moved this case from LA County to Alameda Court in Northern CA.

They destroyed all the teachings that I had organized. Even major retreat centers that hosted my teachings cancelled given the strength of the USA Court verdict. I posted pictures of my wedding on Facebook and every page was attacked. The lady I married was first very supportive of my fight. However she stated she could not stay anymore, She was depressed. In April 2016 she left and went to China from Washington DC. We stayed in touch for a few months, but she chose to never return, her life in China was better. It was clear that NCF would not let me do any teachings nor permit me to get married.

My livelihood was destroyed. My family was destroyed. It was imperative that I clear my name and I was hopeful that Mr McKesson would do the job.

I had to put up my story online so I created lamanorbu.net. My friend is the granddaughter of the Native American Sitting Bulls helped me. However her Church the Sacred Heart organization was attacked with Federal claim Complaints by Emilia Wang, Yuan Miao and NCF. She had no choice but to withdraw all support towards me. I had to withdraw the website eventually. There was no way I could get my story out. I was hopeful that at least in the Appeal and in the second case they inserted in the Alameda Court that this matter would be resolved.

I met Kevin when a settled statement was being agreed upon in October 2016 and in early 2017 he told me he was preparing the Appellant Brief. I had no communication from him until January 2019. This is after a series of e-mails I sent him requesting for an update on my case. We convened a meeting and he told me that my appeal was in June or July 2018 and that we lost. He did not have the time to tell me and that we still have the second case in the Alameda Court.

He told me that we could not appeal this further as the Appellate Court Justices said they would impose sanctions on him and he would have consequences to face with the CA Bar if he proceeded with the appeal. He told me a pre-trial conference was scheduled for the second case and I would be provided with an update and the transcript of the Appeal case by end of week. Till the date of today March 05 2019 I have not been provided with the transcript of the Appeal case nor an update to the second case. I made enquiries with the Alameda Court and they informed me that the case had been transferred to the Stanley Mosk Court in LA. At the Stanley Mosk Court they could not find that Court number on the system nor could they find the Plaintiff Wu Hong name on the system.

It is too costly for me to keep having to go to LA for this matter. Given that the Plaintiff is a Peoples Republic of China resident and she claims that she was seduced and raped

in China at one of the NCF's teachings with me. I have requested that this case be transferred to New York and tried with this matter. The California Bar Association lost the papers of the lawyer that tried to help me on two occasions on a no fee basis.

I hereby submit under Oath that the contents and evidence provided by the Defendants under oath at the LA Superior Court; the subsequent appeal at the Court of Appeal, the cases entered in the Alameda Court transferred to the LA Superior Court Stanley Mosk Court are perjured, false and part of an organized crime by a Chinese organization that manipulates people in the name of Tibetan Buddhism and Hinduism and particularly preys on those in immigrant and minority communities. They claim special psychic abilities in front of the public, yet the truth is that they are in fact a group of fraudsters that have mastered manipulation of the innocent public; the Californian Judicial system, the California Bar Association and even the US Government. There is an ongoing pattern of obvious deceit and manipulation in providing false testimony in the judicial and executive branches of the system to secure decisions and judgments based on same.

Upon obtaining these Awards, Opinions, Judgments, US Immigration residency and citizenship based on false evidence from the US judiciary and the US immigration they use this in the ethnic communities to claim they are the Supreme Being incarnate

based on their predictions that such misfortunes and fortunes would happen as awarded by the Judiciary and the US immigration. Their followers would take this as proof of their claims of being such an incarnation and donate huge sums of money to their organization registered as a Non-profit in San Jose USA by the name of New Century Foundation.

They further prey on people who are devoted to Tibetan Buddhism and Hinduism and once committed to their organization they destroy them if they want to leave, either through death or destroy all their financial support to leave them isolated and in a no choice position but to return to them. Their actions are causing a disgrace to these ancient traditions and the sanctity of the Government and the Judicial Order. In the interest of TRUTH, justice, fairness, social order, religious freedom, autonomy and the prevention of further crimes by this organization it is humbly requested that this destructive behavior be stopped.

This Affidavit is being made at the earliest opportunity after being provided the opinion of the Court of Appeals in January 2019 and obtaining a recoding of the Appeal thereafter. An obvious pattern began to emerge as the second California Barred lawyer refused to provide any updates and provided inconsistent and false information in our last meeting in January, for reasons best known to him. The lawyers that were retained

for this matter either developed conflicts of interest as the case progressed and/or became incompetent to handle the matter.

The evidence on which the claims rested were based entirely on perjury and deceit to manipulate the judicial system in an attempt to destroy a person that left and walked away from a destructive cult organization by the name of New Century Foundation ('NCF'). They obtained Court verdicts based on false evidence and then published it online in a campaign to discredit Tibetan Lamas and Tibetan Buddhism. They have actively publicized the Court's verdict to spiritual organizations and the community at large. It is now apparent that this is part of a wide conspiracy.

In the name of Tibetan Buddhism and Hinduism they are conning and exploiting many people to believe in their leader Yuan Miao and are swindling money in the name of religion and faith. It is not an organization dedicated to the raising of consciousness but rather one that is based on exploitation, excessive lust, deceit, destructive cult behavior. This case has implications for the Judiciary; the California Bar Association; the Body that regulates immigration, the Government. It demonstrates how a Chinese foreign group can utilize the US legal and governmental system to manipulate their agenda, discredit Tibetan Buddhism and Hinduism and destroy the lives of many

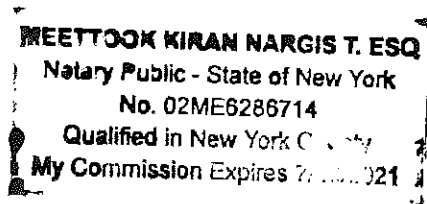
persons who vouch their faith on such a group to loot them of their wealth and then destroy them if they speak out.

I Lama Nurbu hereby declare under the penalty of perjury and declare under oath that the contents stated herein in this document are true and correct.



Lama Nurbu, Affiant

Subscribed and sworn before me on this day of March 05 2019



Notary Public

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1 I Namgyal Dhonup also known as Chin Yuan Chu of Tibetan origin

2 Pay Homage to Guru Padmasambhava

3 The Great Lama of all the realms

4 The Guiding principle and essence of the Universe

5 Duly Depone under Oath

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9 That I am a life time practitioner of the Nyingma and Kagyu lineages. The Nyingma is
10 known as the oldest of the 4 lineages of Tibetan Buddhism. Nyingma literally means
11 'ancient'. The Founder is Guru Padmasambhava who came from India. The Nyingma
12 School is associated with Thermas hidden treasures. When Buddhism was declining
13 during the rule of King Langdarma. Guru and his disciples hid numerous scriptures in
14 ritual objects and relics in caves and rocks on mountains. In relevant times they appear.
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19 The Himalayan tradition is in my blood, by virtue of my birth, family and I have met and
20 studied with countless monks and Himalayan Masters throughout the years - both of
21 Tibetan and Hindu. I lived in India and my father had a business and traded along the
22 Himalayan trade routes. Therefore the science to discern a genuine from a counterfeit I
23 learnt at an early age. Please see Exhibit - an article from the Sinorama widely read
24 publication in Taiwan.
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24 publication in Taiwan.
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1 I came to Taiwan and expanded my family business and founded Zambala inc.

2 Zambala is the Buddha that brings abundant riches to the mind, body and spirit
3 according to Tibetan Buddhism. We became a supplier and consular on many Buddhist
4 artifacts, history, sacred stones, Thankas, antiques and scriptures.
5

6 We support products made by traditional Tibetan artisans; so our handcrafted statues,
7 figurines and paintings are intricate and detailed. In fact, we contribute a portion of our
8 net proceeds to humanitarian aid in India, Nepal, and Tibet. We are well versed with
9 the Himalayan regions and its ancestors.
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12 Our own Zambala incense comes from natural medicinal herbs from the highest altitude
13 in the world: Tibet and the Himalayan belt. Aromatic herbs have been known for their
14 natural healing powers for centuries. Skillfully prepared incense can induce sleep, calm
15 the mind, alleviate pain, and drive away harmful spirits. Zambala incense is formulated
16 according to Ancient Tibetan Scriptures. The nectar in the incense is blessed with sacred
17 prayers for over 49 days by renowned Tibetan Masters.
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22 Eco-friendly practices are part of our mission as we promote biodegradable and natural
23 products through media, newsletters, and advertising. We take pride in preserving and
24 purifying the environment. Many Lamas and Masters come to the store to purchase
25 these products.
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1 Many counterfeit products have flooded the market by China. Sorting counterfeits from
2 genuine requires powers of discernment as well a heritage and the ones that
3 understand it.
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5 I first met Lama Nurbu in Taiwan in 1999. I was very fond of him he had a beautiful
6 grace with him. He was a strict ordained monk at the time. His devotion to his faith
7 was exemplary. He embodied devotion and his love for the Divine Mother knew no
8 bounds.
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12 I would take him to parties and watch his behavior. I always noticed he kept a
13 respectful distance from women. In fact they were the ones who were interested in him.
14 He never touched any of the alcohol that was served. I knew he was a man of integrity
15 and I became very good friends with him and we kept in touch when he went to the
16 USA.
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21 I heard Lama met a Shakti. It was the first time I heard of Yuan Miao through Lama
22 Nurbu. I came to the USA to visit. I attended one teaching and felt that the chants that
23 Lama were doing had more resonance than Miaos, the crowds generated too had more
24 interest in Lama. I did not feel her claims on who she is was accurate. Her marketing
25 material looked more like self-centric propaganda about herself. She claimed she is of
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1 Tibetan descent especially in the Nyingma lineage and family members have been
2 Thermas. There is nothing to that effect. Her past is that she was formerly married
3 with a daughter and a CCTV Director with her father and family are officials of CCP.
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5
6 It was apparent that she had no spiritual discipline or prowess. Many of the students
7 were in fact interested in Lama. His words had more gravity. I was shocked to learn
8 that she manipulated Lama's devotion to the Divine Mother to request Lama to sleep
9 with her and to drink alcohol. I told Lama not to believe in her claims. I knew the
10 innocence he had from the monastery did not equip him with the reality of the world.
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15 My Zambala business was doing well when I had opened up and branched out in the
16 USA in 2005. In 2008 Yuan Miao first came to the store to request I put the Love Sutra
17 Lama book on sale in the stores. The book was written in Chinese which I do not know
18 how to read. I saw Lama's picture on it and kept it as a sign of respect. Lama
19 informed me afterwards that he did not write that book it was written by Miao to
20 promote the Divine Mother and NCF teachings. He had not read the book but trusted
21 Miao.
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27 In our culture we do not have concepts to cheat, deceive and manipulate people in the
28 name of Dharma.

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2 In 2013 an employee of Zambala informed me that Yuan Miao had referred about me in
3 one of her books as someone of low morals, no faith, a cheater and sexual abuser.

4
5 Everyone in the community knew it was me when they read it. I did not understand why
6 she attacked me like this, when I only met her briefly and in fact I tried to help her sell
7 her book.
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11 I noticed that her organization started to spread like mushrooms especially once they
12 managed to get hold of the marketability of Lama and the Tibetan Buddhism identity.
13 They have exploited peoples love, trust and faith in Tibetan Buddhism and Hinduism and
14 capitalized on it. They then persecute the genuine ones in books sold in the
15 community, in the judiciary and in the Government.
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19 Whilst they were expanding I noticed that my sales especially in the USA branch was
20 declining, to the extent that we are operating at a loss and cannot pay the rent. We are
21 now in the process of commencing bankruptcy proceedings.
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25 I met with Lama in early 2019 and it became apparent that this was part of a big
26 conspiracy to capitalize and trade in the name of Tibetan Buddhism and Hinduism.
27

28 Seek to destroy us but then capitalize on a growing market worth 80 billion US dollars.

1
2 NCF in collusion with other organizations such as enlighten.org publish the following:
3
4 Bodhisattva Xuanzang stated in the past: **'It is difficult for the correct dharma to**
5 **manifest if the erroneous ones are not destroyed.'** "Tibetan Tantric Buddhism is a
6 **parasite on Buddhism. It is not Buddhism and is originated from Hindu Tantric Yoga**
7 **with copulation tantra as the core practice. For those grass-roots and die-hard**
8 **supporters of Tibetan Tantric Buddhism, CEO Zhang Gongpu urges them to find out**
9 **the contents which have been disclosed by the Foundation and thereby verify the**
10 **doctrines of Tibetan Tantric Buddhism accordingly. He hopes that those supporters,**
11 **upon their verification, can break away from the hypocritical and worthless practice**
12 **as soon as possible, and will also decide to strongly condemn the copulation**
13 **practice of Tantric Buddhism altogether. In this way, the true Buddhists should urge**
14 **the Dalai Lama to make a public declaration together with the other three major**
15 **sects of Tantric Buddhism: Tibetan Tantric Buddhism will abandon the Couple-**
16 **Practice Tantra and its cultivation and practices, effective immediately. Or they can**
17 **make another public declaration: The doctrines of the Couple-Practice Tantra, which**
18 **was introduced from Tibet to Taiwan, belong to Lamaism exclusively and have**
19 **nothing to do with orthodox Buddhism. Only those declarations can help Taiwan**
20 **society remain truly peaceful and free. (Reported by You Shuqing) 20110701 All these**
21 **signs prove that Tibetan "Buddhism" is an evil cult and the sexual assaults by the**
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1 lamas are not merely isolated cases because its doctrines are fundamentally
2 wrong.

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5 This conspiracy becomes apparent. NCF destroyed me and Lama and now is publishing
6 marketing material that claims she is a:

7
8 **Himalayan Dakini Master**

9 **Himalayan Master**
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12 Please see the attached Exhibit - which is her flyer for a teaching at UCLA. As a matter
13 of urgency we request an investigation done by the Chinese Government on her back
14 ground and the authenticity of her claims.
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18 We want a stop to the use of these sacred terms on her and her organization and we
19 demand the reliefs set forth in the Complaint.
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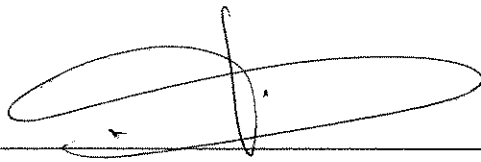
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24 DATED: February 9 2019

25 */S/ N. Dhonup*

26 Namygyal Dhonup
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CHIN-YUAN CHU, Affiant
Subscribed and sworn to before me this 09 day of February, 2019

MEETTOCK KIRAN NARGIS T. ESQ
Notary Public - State of New York
No. 02ME6286714
Qualified in New York County
My Commission Expires 7/29/2021

Notary Public

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$$\left. \begin{array}{l} \text{---} \\ \text{---} \\ \text{---} \end{array} \right\} \text{---}$$

A black and white photograph of a large, ornate, arched stone structure, possibly a tomb or monument, with intricate carvings and a central arched opening. The structure is set against a dark background.

1. The first step is to identify the problem or question that needs to be solved. This involves understanding the context and the specific requirements of the task.

2. Next, it is important to gather relevant information and resources. This may include researching existing solutions, consulting with experts, or collecting data.

3. Once the information is gathered, the next step is to analyze it and identify the key factors that influence the solution. This often involves breaking down the problem into smaller, more manageable parts.

4. After analysis, a plan should be developed that outlines the steps to be taken to solve the problem. This plan should be flexible enough to allow for adjustments as more information is discovered.

5. The final step is to implement the plan and monitor the progress. It is important to stay organized and keep track of the results to ensure that the solution is effective.

天珠傳奇

The Legends of DZi Beads

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

1992年

在以前，西
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[illegible][illegible][illegible]

1. 凡在本行开立存款账户的客户，均可向本行申请开立支票。
 2. 支票的有效期为自签发之日起 10 个工作日内。
 3. 支票的金额不得超过账户余额。
 4. 支票的签发人必须是账户持有人或其授权代理人。
 5. 支票的收款人必须是合法的收款单位或个人。
 6. 支票的签发必须使用本行提供的支票簿。
 7. 支票的签发必须加盖本行规定的印章。
 8. 支票的签发必须填写完整，不得涂改。
 9. 支票的签发必须遵守国家的法律法规。
 10. 支票的签发必须遵守本行的规章制度。

[illegible][illegible]

有 效 的 治 療 方 法 是 治 療 癲 癇 的 關 鍵 。 癲 癇 的 治 療 方 法 有 藥 物 治 療 和 手 術 治 療 兩 種 。 藥 物 治 療 是 癲 癇 治 療 的 主 要 方 法 ， 手 術 治 療 是 癲 癇 治 療 的 補 充 方 法 。 癲 癇 的 治 療 方 法 有 藥 物 治 療 和 手 術 治 療 兩 種 。 藥 物 治 療 是 癲 癇 治 療 的 主 要 方 法 ， 手 術 治 療 是 癲 癇 治 療 的 補 充 方 法 。

[illegible][illegible][illegible]

Wages and Incentives

There is a large literature on the effects of wages and incentives on performance. The literature is divided into two main branches: the behavioral branch and the economic branch. The behavioral branch focuses on the effects of wages and incentives on performance in the context of social norms and social interactions. The economic branch focuses on the effects of wages and incentives on performance in the context of individual incentives and individual performance. The behavioral branch is represented by the work of Akerlof and Krashinsky (1992) and the economic branch is represented by the work of Becker and Murphy (1990).

[illegible][illegible]

At present, the only source of information on the situation in the country is the newspaper "The People's Voice" which is published in the city of Hanoi. The newspaper is owned and edited by the government and is the only source of information on the situation in the country.

[illegible]

It is a common mistake to think that the only way to avoid the problems of the first two methods is to use a third method, the method of least squares. This method is also based on the assumption that the data are normally distributed, and it is also subject to the same problems as the first two methods. The method of least squares is only a special case of the method of maximum likelihood, and it is only valid when the data are normally distributed. In other words, the method of least squares is only valid when the data are normally distributed, and it is only valid when the data are normally distributed.

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[illegible]

the Government's chief spokesman
said today. "The Government has
no intention of withdrawing from
any of its commitments in the
area of human rights."

[illegible]

The following is a list of the names of the persons who have been appointed to the various positions of the Board of Directors of the City of New York, for the year 1900, as provided for by the Charter of the City of New York, Chapter 190, of the Laws of 1897, as amended.

The company's net income fell 20% from \$1.1 million in 1997 to \$880,000 in 1998. The company's net income fell 20% from \$1.1 million in 1997 to \$880,000 in 1998. The company's net income fell 20% from \$1.1 million in 1997 to \$880,000 in 1998.

After 12 hours of study of the manuscript, Joseph Patrick, an American who had written some newspaper articles about the case, wrote: "From the time they would appear they would make a lot of noise. If you could hear them with your hands they would make a lot of noise and the noise would have to be something different, say a musical note or the typical screaming of the birds they are used to hear from their sky, musical notes and your mouth and nose."

[illegible]

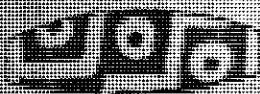

1. REASON FOR REQUEST - [REDACTED]

[illegible][illegible]

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the 1990s, the number of people in the world who are illiterate has increased from 1.2 billion to 1.5 billion. The number of illiterate people in the world is expected to reach 1.7 billion by the year 2015. The number of illiterate people in the world is expected to reach 1.7 billion by the year 2015. The number of illiterate people in the world is expected to reach 1.7 billion by the year 2015.

1990年，在《中国农村改革与农村发展》一书中，作者指出，中国农村改革的成功，关键在于实行了家庭联产承包责任制，使农民获得了生产经营自主权，调动了农民的生产积极性，从而促进了农村生产力的发展。这一观点在当时具有重要的理论意义和实践指导意义。随着改革开放的深入，农村改革不断深化，农村经济结构不断优化，农村生产力得到了进一步的解放和发展。这一过程充分体现了农村改革对农村发展的巨大推动作用。

[illegible]

1. The following information was obtained from the records of the
 2. Federal Bureau of Investigation, Department of Justice, and the
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[illegible]

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the situation.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the team.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete each task.

4. The fourth step is to implement the plan. This involves assigning tasks to team members, setting deadlines, and monitoring progress. It is important to communicate regularly and adjust the plan as needed.

5. The final step is to evaluate the results of the project. This involves comparing the actual outcomes to the objectives and goals, identifying any gaps or areas for improvement, and documenting the lessons learned.



「黑箱」(左)：圖中一連串機器，是台大「黑箱」計畫的一部分。圖中右側則是台大「黑箱」計畫的一部分。圖中右側則是台大「黑箱」計畫的一部分。

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小小先達建設「家」

陳德水，台大工學院院長，是台大「黑箱」計畫的負責人。他是一個非常勤奮的人，他每天工作到深夜，他每天工作到深夜，他每天工作到深夜。

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蓮花往牛車水，這座城市的各個角落，到處都是蓮花。蓮花往牛車水，這座城市的各個角落，到處都是蓮花。

蓮花往牛車水，這座城市的各個角落，到處都是蓮花。蓮花往牛車水，這座城市的各個角落，到處都是蓮花。

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新珠貴貴？假珠真貴！

「在國人眼中，新珠貴，假珠真貴。」在國人眼中，新珠貴，假珠真貴。在國人眼中，新珠貴，假珠真貴。

[illegible]

For early January, we have been able to choose a short piece, a short recording, questions, activities, songs, or books. I have a book and record which are not really fully complete, and I'm going to make a record of them. An answer for every day with details of the people and to make a list of the people.

[illegible]

1. 凡在本行開戶之存款人，其存款之利息，均按本行所定之利率計算。
 2. 凡在本行開戶之存款人，其存款之利息，均按本行所定之利率計算。
 3. 凡在本行開戶之存款人，其存款之利息，均按本行所定之利率計算。
 4. 凡在本行開戶之存款人，其存款之利息，均按本行所定之利率計算。
 5. 凡在本行開戶之存款人，其存款之利息，均按本行所定之利率計算。

The image shows the front cover of a book. The cover is covered in a dense, repeating pattern of small squares and dots, creating a textured, woven appearance. The pattern is in shades of gray, with the dots being slightly darker than the squares. The overall effect is a fine, grid-like texture that covers the entire surface of the book. The book is oriented vertically, and the spine is visible on the left side. The top edge of the book is slightly rounded. The background is a solid, light gray color.

[illegible]

1. The first step in the process of creating a new product is to identify a market need. This involves conducting market research to understand the preferences and behaviors of potential customers. Once a need is identified, the next step is to develop a concept that addresses this need. This concept should be innovative and differentiated from existing products in the market.

2. After developing a concept, the next step is to create a prototype. This allows the development team to visualize the product and test its functionality. Prototyping can be done using various methods, such as 3D printing or building a physical model. The prototype is used to gather feedback from potential users and make necessary adjustments to the design.

3. Once the prototype is refined, the next step is to conduct a feasibility study. This study evaluates the technical, financial, and market viability of the product. It involves assessing the resources required for production, the potential costs, and the competitive landscape. This step helps to determine if the product is worth pursuing further.

4. The final step in the process is to launch the product into the market. This involves creating a marketing strategy to promote the product and reach the target audience. The launch is typically followed by a period of monitoring and evaluation to assess the product's performance and gather customer feedback. This feedback is used to make improvements and refine the product over time.

THE FUTURE OF THE FIRM

[illegible]

這件「名聞中外」的盜案發生，是當時上海一宗奇聞，上海巡捕房接到報案，立刻派員前往調查，果然在該處發現了這批被盜的銀錢。巡捕房隨即展開調查，經過一番努力，終於在該處發現了這批被盜的銀錢。巡捕房隨即展開調查，經過一番努力，終於在該處發現了這批被盜的銀錢。巡捕房隨即展開調查，經過一番努力，終於在該處發現了這批被盜的銀錢。

「我係個好學生，成績好，有責任感，又肯努力讀書，所以，我考到香港中文大學，入讀中國歷史系。我係個勤奮的人，所以，我考到香港中文大學，入讀中國歷史系。我係個勤奮的人，所以，我考到香港中文大學，入讀中國歷史系。」

[illegible]

一、維護黨的領導，堅決執行黨的路線、方針、政策，維護黨的團結和統一，維護黨的形象和聲譽。

[illegible]

business owner has to make the most of all available strategies to succeed. Technology exists. The result is many people doing this or that for their business. Some are successful and some fail. The key is to understand and use technology to your advantage.

A personal and confidential letter received from the father of a young girl isolated from a female prisoner who suffered a severe nervous breakdown when she was 15.

History of business culture, especially in
business and industry in America and
the world.

The city and the provincial government have agreed to share the costs of the new bridge. The city will contribute 50% of the total cost, while the province will contribute the remaining 50%. The bridge is expected to be completed by the end of 2005. The city government will also be responsible for the maintenance of the bridge.

本書是作者多年研究天珠的結晶，內容豐富，圖文並茂，是研究天珠的必讀之書。



How did these things
become? Can they
be used with ritual
objects? There is no
doubt that they are
Buddhist objects,
perhaps the most
important for Tibetan Buddhism.

從宗教看天珠

The Buddhist Spin on Dzi Beads

文：王仲良

ISBN 957-03-0111-1

[illegible]

The walls of all kind show no more
 several new thoughts (I have had
 their presence, and power of effects
 living within). The prophetic voice
 made known to them. I have found
 and have found within each one
 the necessity of their own being.
 For when we recognize the religious
 nature of all life, we find that
 we have made them to be made
 and that we have made them.

14. There are no other persons who have been
personally interviewed, and none of the persons
mentioned above is known to the informant.
15. The informant is not aware of any other
persons who have been interviewed, and none of the
persons mentioned above is known to the informant.
16. The informant is not aware of any other
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persons mentioned above is known to the informant.
17. The informant is not aware of any other
persons who have been interviewed, and none of the
persons mentioned above is known to the informant.
18. The informant is not aware of any other
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persons mentioned above is known to the informant.
19. The informant is not aware of any other
persons who have been interviewed, and none of the
persons mentioned above is known to the informant.
20. The informant is not aware of any other
persons who have been interviewed, and none of the
persons mentioned above is known to the informant.

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Learning that the FBI had been told that it might be other men who could help identify the white man, the news reporter had asked to talk to them, he said they didn't want any more men with them. "That's all we have," he said.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the investigation. The investigator must identify the problem and the scope of the investigation. This is done by the investigator who is responsible for the investigation.

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1. The first step is to identify the problem or question that needs to be addressed. This involves understanding the context and the specific requirements of the task.

The following table shows the results of the regression analysis for the dependent variable "Number of children in the household" (N = 1,000). The independent variables are "Age of the head of household" and "Gender of the head of household". The table includes the coefficient estimates, standard errors, t-statistics, and p-values for each variable.

Variable	Coefficient	Standard Error	t-statistic	p-value
Age of the head of household	0.001	0.000	1.2	0.23
Gender of the head of household	0.002	0.000	1.5	0.13
Constant	1.500	0.000	1500.0	0.000



香港中文大學籌備委員會，在維多利亞港畔，舉行籌備工作會議。圖為籌備委員會成員，在維多利亞港畔，舉行籌備工作會議。圖為籌備委員會成員，在維多利亞港畔，舉行籌備工作會議。

的自願者，主席張氏則勉勵他們要繼續努力，「這批自願者太重要了！」

「主席和各位自願者太棒了，」他接著說，「我敢保證，你們會做得很好。」這批自願者又繼續在主席面前，向中文大學籌備委員會負責人謝世榮、李國章、曾國文等致謝，當時場面溫馨感人，謝世榮還特別致詞，在場眾人舉行，進行了一連串籌備工作大匯報，隨後是謝世榮的致辭，他勉勵自願者以大多數人，沒有人能做到的決心，「好幾件事有了可能不會，」謝世榮如此表示。

此時謝世榮，即席向自願者提出一項建議，他說：「你們要繼續努力，你們的自願工作，是這項工作的基礎，你們的自願工作，是這項工作的基礎。」

謝世榮的致辭，在場眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。

樓上眾人不外乎

在謝世榮致辭後，場下眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。謝世榮的致辭，在場眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。

謝世榮的致辭，在場眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。

謝世榮的致辭，在場眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。

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謝世榮的致辭，在場眾人熱烈響應，他呼籲大家，要繼續努力，要繼續努力，要繼續努力。

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一、國際社會對中國人權問題之關注與反應
 國際人權保障體系之發展，是國際人權保障工作之基礎。在國際人權保障體系中，國際人權保障機構之運作，是國際人權保障工作之核心。國際人權保障機構之運作，是國際人權保障工作之核心。國際人權保障機構之運作，是國際人權保障工作之核心。

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and, with spiritually religious persons with
in proper touch, as Pauline, rather, by the
ground with spiritual persons," says Luther.
"It is the spiritual and the one
world, as a matter of fact, with spiritual
persons, because it would be through the
temporal. And this is the world of the
spiritual world, being the one of
being that is the spiritual person, but
not the "material" world, as the
temporal world. "The spiritual person
is the spiritual person, and the spiritual
person is the spiritual person."

1. The first step in the process of the
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The following table shows the results of the regression analysis for the dependent variable "Number of children in the household" (N = 1,000). The independent variables are "Age of the head of household" and "Gender of the head of household". The results are presented in the following table:

1. The first step in the process of creating a new product is to identify a market need. This involves conducting market research to determine what consumers are looking for and what problems they are trying to solve. Once a need is identified, the next step is to develop a concept that addresses that need. This is often done through brainstorming sessions with a team of designers and engineers. The concept is then refined through prototyping and testing, with feedback from potential users being used to make improvements. Finally, the product is manufactured and distributed to the market. Throughout this process, it is important to maintain a focus on the user's needs and to iterate on the design as more information is gathered.

Abstract The purpose of this study was to determine the effect of a 12-week, 30-minute, three times per week, low-impact aerobically and resistance training program on the physical fitness of sedentary, middle-aged women. The study was a randomized, controlled trial. The subjects were 20 sedentary, middle-aged women who were randomly assigned to either an exercise or control group. The exercise group performed a 12-week, 30-minute, three times per week, low-impact aerobically and resistance training program. The control group did not exercise. The physical fitness of the exercise group improved significantly compared to the control group. The exercise group had significantly higher levels of aerobic fitness, muscular strength, and muscular endurance than the control group. The exercise group also had significantly lower levels of body fat and body mass index than the control group. The results of this study suggest that a 12-week, 30-minute, three times per week, low-impact aerobically and resistance training program can improve the physical fitness of sedentary, middle-aged women.

1. The first step is to identify the problem. This involves understanding the current situation and what needs to be improved.

2. The second step is to set goals. These should be specific, measurable, achievable, relevant, and time-bound (SMART).

3. The third step is to develop a plan. This involves determining the steps needed to achieve the goals and assigning responsibilities.

4. The fourth step is to implement the plan. This involves putting the plan into action and monitoring progress.

5. The fifth step is to evaluate the results. This involves comparing the actual results with the goals and identifying areas for improvement.

Los Angeles publisher that many people had in mind as a result of February 1968's "Smog." This is young, "European" music, but a sophisticated marriage of folk, which Gary's numerous partners and girlfriends and the Beach Boys & Jethro Tull have been a part of the process.

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the work.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources and timeline needed to complete them.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress regularly to ensure that the project is on track.

5. The final step is to evaluate the results of the project. This involves assessing the outcomes against the objectives and goals and identifying any lessons learned for future projects.

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Ongoing & Upcoming Events



Phoenix Rising: Sacred Mantras for A New Earth @ UCLA!

Rise from ashes.

Journey beyond birth and death.

Awaken the heart of wisdom.

Saturday | 3.9.19 | 6 — 8pm

Schoenberg Hall

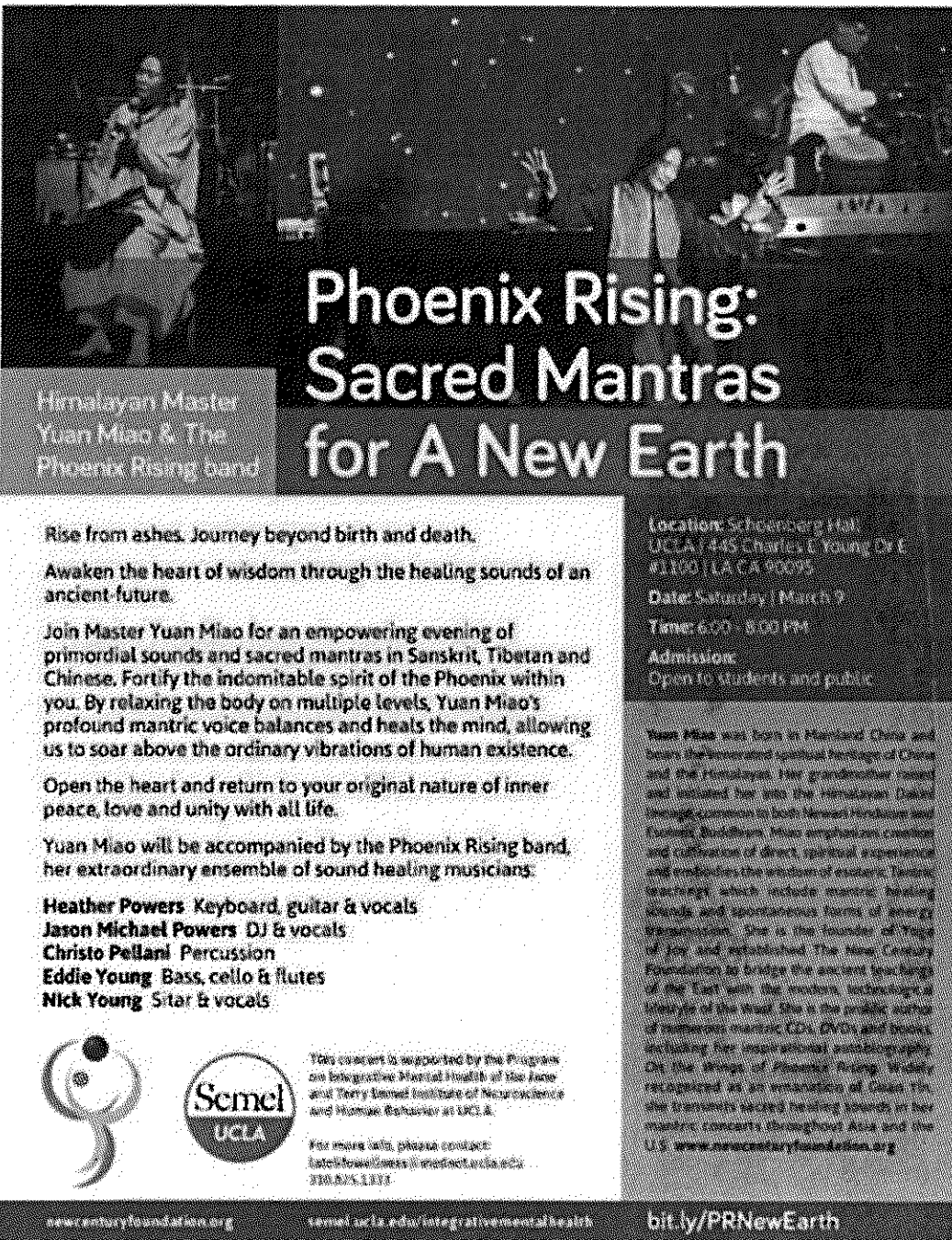
> *RESERVE SEATS HERE* <<

The Phoenix soon rises at UCLA! Save the auspicious date! UCLA welcomes Teacher Miao and the Phoenix Rising band to Schoenberg Hall. Prepare to invoke the high vibrational energies of New Earth and multidimensional existence. This event is open to UCLA students and the general public. Reservations are required as seating is limited. Please remember to reserve seats in advance! Hear from the heart and be a contributory drop to this unforgettable, transformational evening. May we "hear" well and awaken our primordial wisdom for the benefit of all beings.

We express our deep gratitude to dear ally and friend, Dr. Helen Lavretsky, Director of the Semel Institute, for her devotion and intent to manifest this concert at UCLA!

The concert is being supported by the Program on Integrative Mental Health of the Jane and Terry Semel Institute of Neuroscience and Human Behavior at UCLA.

Semel Institute



**Phoenix Rising:
Sacred Mantras
for A New Earth**

Himalayan Master
Yuan Miao & The
Phoenix Rising band

Rise from ashes. Journey beyond birth and death.
Awaken the heart of wisdom through the healing sounds of an ancient future.

Join Master Yuan Miao for an empowering evening of primordial sounds and sacred mantras in Sanskrit, Tibetan and Chinese. Fortify the indomitable spirit of the Phoenix within you. By relaxing the body on multiple levels, Yuan Miao's profound mantric voice balances and heals the mind, allowing us to soar above the ordinary vibrations of human existence.

Open the heart and return to your original nature of inner peace, love and unity with all life.

Yuan Miao will be accompanied by the Phoenix Rising band, her extraordinary ensemble of sound healing musicians:

Heather Powers Keyboard, guitar & vocals
Jason Michael Powers DJ & vocals
Christo Pellani Percussion
Eddie Young Bass, cello & flutes
Nick Young Sitar & vocals

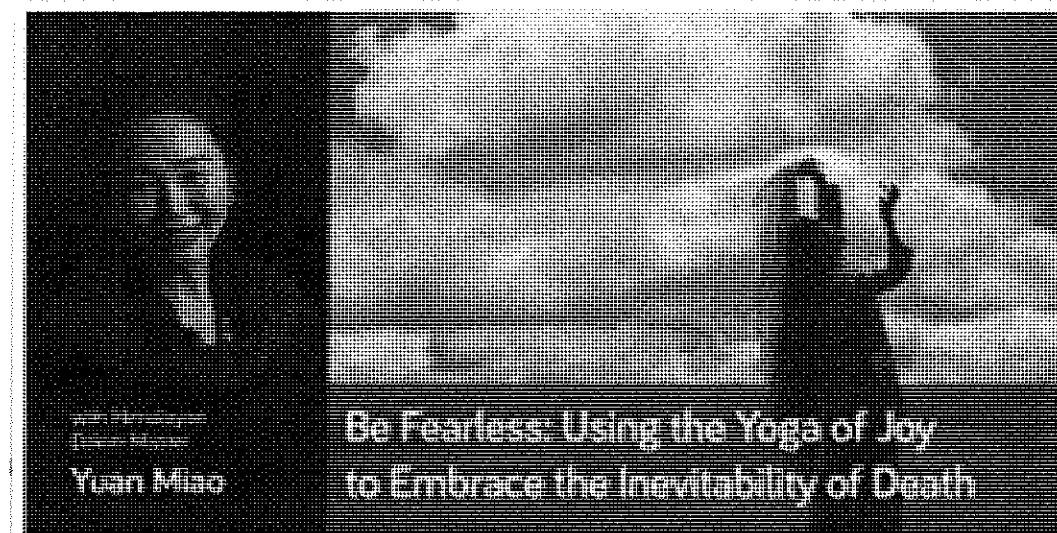
This concert is supported by the Program on Integrative Mental Health of the Anne and Terry Dorel Institute of Neuroscience and Human Behavior at UCLA.

For more info, please contact:
batel@ucla.edu | mednet@ucla.edu
 310.825.1133

Location: Schoenberg Hall,
 UCLA / 445 Charles E. Young Dr E
 #1100 | LA CA 90095
 Date: Saturday / March 9
 Time: 6:00 - 8:00 PM
 Admission:
 Open to students and public

Yuan Miao was born in Mainland China and bears the illuminated spiritual heritage of China and the Himalayas. Her grandmother raised and initiated her into the Himalayan Dharma through common to both Newar Hinduism and Tibetan Buddhism. Miao emphasizes emotion and cultivation of direct spiritual experience and embodies the wisdom of esoteric Tibetan teachings, which include mantric healing sounds and spontaneous forms of energy transmission. She is the founder of Yoga of Joy and established The New Century Foundation to bridge the ancient teachings of the East with the modern, technological lifestyle of the West. She is the prolific author of numerous mantric CDs, DVDs and books, including her inspirational autobiography, *On the Wings of Phoenix Rising*. Widely recognized as an emanation of Quan Yin, she transmits sacred healing sounds in her mantric concerts throughout Asia and the U.S. www.newcenturyfoundation.org

newcenturyfoundation.org semel.ucla.edu/integrativementalhealth bit.ly/PRNewEarth



**An experiential workshop
with Teacher Miao**

SUN | 3.10

2:00 — 3:30pm

UCLA | Semel Institute

C-Floor Auditorium (C8-183)

»>REGISTER HERE<<

The Yoga of Joy is not merely a yoga “practice,” but rather an entire Wisdom Way of living and embracing life, including cultivating the first awareness: that we will inevitably “die” one day. Every human being must face and one day embrace the greatest inevitability of death. Embodiment the Wisdom of Joy to become fearless and resolve anxieties or worries around death and dying. Engage spontaneous energetic practices and receive transmissions of Joyful Wisdom from Teacher Miao’s Himalayan lineage teachings.

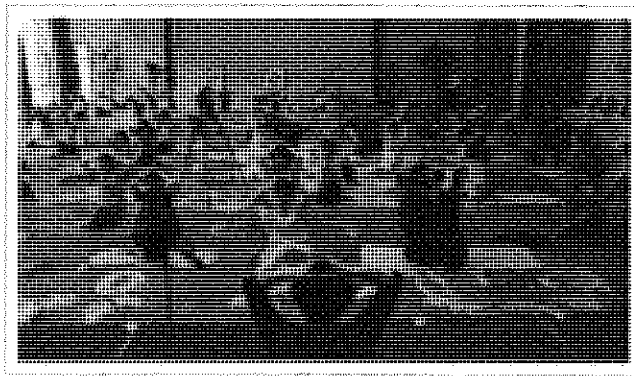
Teacher Miao’s workshop is part of the 4th annual Integrative Medicine and Mental Health Conference at UCLA — The Healing Power of Spirit: Overcoming the Fear of Death & Dying, also spearheaded by Dr. Helen Lavretsky. The 2-day weekend conference will be a profound and practical immersion in resolving our fears around death. Rather than just attend Teacher Miao’s workshop, we welcome our NCF community to attend as many events as possible to learn and transform our relationship with death and dying.

We have much to learn in the West around this sacred initiation and passage to

the Spirit realms. We would like to acknowledge and honor especially those presenters who will appear before and after Teacher Miao on Sunday.

Years ago Teacher Miao shared with Felicia Tomasko, the Editor of LA Yoga, that the West needed to learn to celebrate death in the same way as we might a wedding or a birth. When this occurs, it will demonstrate that the West has transformed and deepened its understanding about "death." She went on to say that most people in the West enter a negative, even depressive spiral around death of loved ones or even as we approach our own impending death; however, this can be changed through our own conscious intent to relate with death. By allowing death to be one of our "master" teachers, we can uplift ourselves and spiral "upward."

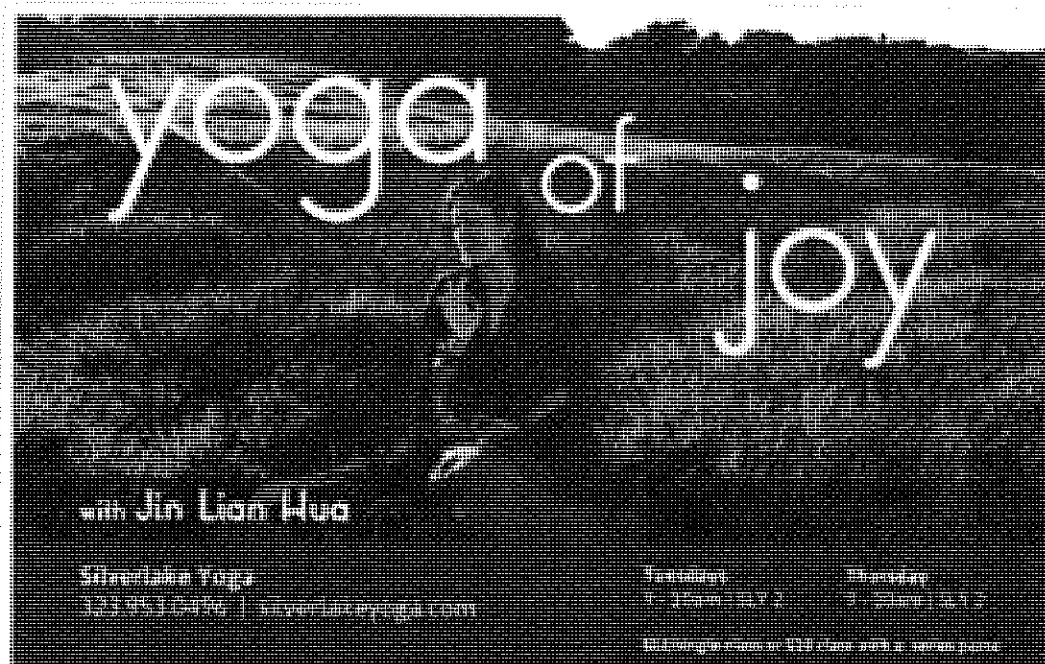
Ongoing Classes in Asia



For a link to ongoing classes in Asia please click [here](#) for a listing of Locations, Times and Contact information.

Ongoing Classes | Los Angeles, CA

Join Jin Lian Hua at Silverlake Yoga



Fully balance and lighten your energy with ancient wisdom from the Himalayas. Reconnect to the primordial source of the Universe – and your own indestructible reservoir of joy and peace or **Vajra Nature**. Yoga of Joy is a tantric practice originating from the lineage of Sakia Tshe Mig.

Consisting of both Vajrayana and Primordial yoga, the practice dynamically combines mantra, mudras, postures, visualizations, intention and breathwork to help us transcend obstacles of body, speech and mind, while awakening the heart. Yoga of Joy

- ✦ Quiets the mind
- ✦ Nurtures the wisdom of your heart
- ✦ Merges and balances both physical and spiritual aspects
- ✦ Circulates blood and subtle energies
- ✦ Promotes inner peace by harmonizing Yin and Yang
- ✦ Strengthens your Vajra Nature

Connect to the source of formless, universal energy and return "home" to the Source of joy, freedom and abundance within you. Celebrate life and joyfully unite Heaven, Self and Earth. **Ya la suo!**

Jin Lian Hua (aka. Carry Kim) has long been immersed in the holistic healing arts as a lineageholder of Yoga of Joy, Yoga Therapist, Ayurvedic and Therapeutic Nutrition educator, breathwork facilitator, tonic herbalist and Shiatsu therapist. Most importantly, in the footsteps of her root teacher, she aims to be a simple "transmitter of joy" and to help students return to their "true nature." She is dedicated to helping others fulfill their Divine potential for the benefit of all beings.

Ya la suo! tsomo.com

Page 7 of 9

Come join us in a spirited and playful session of **Yoga of Joy!**

Together, we will breathe (金剛風呼吸), chant mantra (梵音唱頌), dance (拙火覺醒)

....and of course, play. :-)

Immerse yourself in the vibration of universal love and energy, and recognize who you truly are!

Time: 10–12:00 noon most every Saturday

Location: 1160 W. Latimer Ave, Campbell, CA 95008

Class Includes: Yoga of Joy, including breathing exercises, and mantra chanting.

Yoga of Joy taught by Julie Chang

For further information, or first time participants, please email:

Yikuan@newcenturyfoundation.org / YiCheng@newcenturyfoundation.org

Vajra Wind / Breath of Life | Irvine, CA

Join Jin Lian Hua at The Goddess Temple of Orange County

Vajra Wind: Breath of Life

with Jin Lian Hua

Vajra Wind is our indestructible, original nature. Living in the Phoenix Rising Era and the current Wind Cycle of humanity makes us more vulnerable to stormy winds of emotion and mind. The 21st Century demands a direct, unshakeable connection to our Vajra Nature and Vajra Wind, the breath of life. Fortifying our Vajra Wind ensures our ability to persevere, thrive and even express joy and ecstasy in times of heaviness and tumult in the external world.

Practice Vajra Wind breathwork techniques with Jin Lian Hua, lineageholder in the joyful wisdom tradition of Himalayan Dakini Master Yuan Miao. Vajra Wind breathwork stabilizes the winds of the gross and subtle bodies, opens the doorway to superconsciousness and tethers us to the indestructible reservoir of joy within. Connect to the essence capable of carrying you from the ashes of ordinary existence into an awakened future.

Release stored tension, balance the emotional body and organ systems using Vajra Wind breathwork and conclude with a ceremonial circle accompanied by primordial mantras from Yuan Miao's Himalayan Dakini tradition. Return to your True Nature! Ya la suoi!

BRING: Yoga mat or blanket for floorwork.

WEAR: Comfortable clothing suitable for Yoga.

Thursday | 314 | 7-9 pm

The Goddess Temple of Orange County

17905 Sky Park Circle #A
Irvine, CA 92614

www.goddess templeoc.org
714.992.0555

Public event

Time: 6:30 pm doors open,
7-9 pm presentation

Investment: \$27 or \$30 each for you
and a friend - pay at door

Jin Lian Hua (Cary Kim) has been immersed in the Buddhist healing arts since 2003 as a lineageholder of Yoga of Jing, Yoga Therapy, Acupuncture and Therapeutic Herbalism education, breathwork facilitator, mind, behavior and health therapist. She is a passionate advocate for Mother Earth, and has studied in numerous spiritual, therapeutic and indigenous traditions. Most importantly, in the footsteps of her root teacher, she aims to be an "empty" vessel of joy and supports the return of all beings to their "true nature." She is committed to helping others fulfill their Divine potential for the benefit of all beings. Ya la suoi!

CONTACT:

Cary Kim
nancyng@gmail.com | 310.956.1243